

1 BUCHALTER
A Professional Corporation
2 DYLAN WISEMAN (SBN: 173669)
BRANDON CARR (SBN: 280959)
3 TIFFANY NG (SBN: 301436)
55 Second Street, Suite 1700
4 San Francisco, CA 94105
Tel: (415)227-0900
5 Email: dwisean@buchalter.com

6 Attorneys for Lien Clamant

7 BUCHALTER, P.C.
8

9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11

12 QUINTARA BIOSCIENCES, INC., a California
corporation,

13 Plaintiff,
14

15 vs.

16 RUIFENG BIZTECH INC., a California
corporation, GANGYOU WANG, an individual,
ALEX WONG, an individual, ALAN LI, an
17 individual, RUI SHAO, an individual, and RF
BIOTECH LLC, a California limited liability
18 company;

19 Defendants.
20

21 RUIFENG BIZTECH INC., a California
corporation and GANGYOU WANG, an
individual;

22 Counter-Claimant,
23

24 vs.

25 QUINTARA BIOSCIENCES, INC., a California
corporation, RICHARD SHAN, an individual
and XUELING ZHAO, an individual;

26 Counter-Defendants.
27
28

CASE NO. 3-20-CV-04808-WHA

**DECLARATION OF DYLAN W.
WISEMAN IN SUPPORT OF MOTION
FOR ATTORNEYS FEES FOR BAD
FAITH PROSECUTION OF TRADE
SECRETS**

REDACTED

1 I, Dylan W. Wiseman, declare as follows:

2 1. I am an attorney at law duly licensed to practice in the Northern District of
3 California and a shareholder with the law firm of Buchalter, A Professional Corporation
4 (“Buchalter”). Buchalter is a client claimant and former counsel for RUIFENG BIZTECH INC.
5 (“Ruifeng”), GANGYOU WANG, ALEX WONG, ALAN LI, RUI SHAO, and RF BIOTECH
6 LLC (collectively, “Defendants”). I have personal knowledge of the facts set forth in this
7 declaration, and if called as a witness, could testify competently to those facts.

8 DEFENDANTS’ COUNSEL

9 2. I have been practicing law since 1994, and am the Co-Chair of Buchalter’s Trade
10 Secrets and Employee Mobility Practice Group. I have been practicing exclusively in the field of
11 trade secrets, employee mobility and unfair competition for almost twenty-eight (28) years. In
12 2021 and 2022, I was recognized by the *Daily Journal* as one of California’s Top Trade Secret
13 Lawyers for San Francisco and Los Angeles. In 2023, I was recognized by Intellectual Asset
14 Management (“IAM”) as one of the top trade secrets litigators in the United States. I serve on
15 Working Group 12 – Trade Secrets for the Sedona Conference and am on the committee that is
16 drafting jury instructions for the Defend Trade Secrets Act (“DTSA”). I am resident in
17 Buchalter’s San Francisco and Sacramento offices. In 2017 I opened the Sacramento office,
18 which now has 28 lawyers.

19 3. For this matter, my team consisted of Brandon Carr and Tiffany Ng. Mr. Carr is a
20 Special Counsel in Buchalter’s San Francisco office, and has a background in complex business
21 and commercial litigation matters, including shareholder and partnership disputes. He received
22 his B.A. in Political Science, *magna cum laude*, from the Honors College at the University of
23 California, Los Angeles, and earned his J.D., *cum laude*, at the University of California, Hastings
24 College of the Law where he was a Senior Editor of the *Hastings Bar Journal*.

25 4. Tiffany Ng is a Senior Counsel in Buchalter’s San Francisco office. She
26 specializes in complex commercial litigation and appellate matters. For nearly her entire tenure
27 assisting Defendants, Ms. Ng was living and working from China and assisting her mother. Ms.
28

1 Ng is fluent in Mandarin and Cantonese. Without Ms. Ng's unique skill set, it would have been
 2 considerably more difficult, time consuming, and expensive to assist the Defendants, particularly
 3 because Mr. Wang speaks only Mandarin. She earned her B.A. in Economics from the University
 4 of California, Berkeley and her J.D. from the University of California, Hastings College of the
 5 Law.

6 **BUCHALTER WITHDRAWAL AS COUNSEL:**

7 **RELATIONSHIP WITH SUCCESSOR COUNSEL**

8 5. As the Court is aware, on September 11, 2021, Buchalter filed its Motion to
 9 Withdraw as counsel for Defendants. (Dkt. No. 214.) The Court granted in part and denied in
 10 part Buchalter's Motion to Withdraw. (Dkt. No. 231.) Buchalter remained counsel for
 11 Defendants Wong and Shao, until such time as they too were dismissed when the Court adopted
 12 the Stipulation for Entry of Judgment Subject to Settlement Agreement on November 2, 2021.
 13 (Dkt. No. 237.)

14 6. Thereafter, the remaining Defendants were represented by their current attorney.
 15 Buchalter's relationship with Defendants' current attorney can best be characterized as
 16 tumultuous. Defendants' current lawyer filed a Motion for Attorneys' fees seeking \$4.5 Million,
 17 which included the services provided by Buchalter, but Defendants' counsel did not attach
 18 Buchalter's invoices, or the invoices of the experts and consultants retained by Ruifeng and Mr.
 19 Gangyou Wang. I determined on Friday, July 28, 2023 that this had occurred after I had
 20 difficulty reviewing the multitude of ECF entries by Defendants' counsel. (*See* Dkt No. 383
 21 [containing Exhibits re: ECF 376, ECF 378, ECF 377]; Dkt. No. 385 [containing Exhibits re:
 22 ECF 381, ECF 379, ECF 383, ECF 382, ECF 380, EXF 378, ECF 384]; Dkt. No. 386 [containing
 23 ECF 385, ECF 379, ECF 383, ECF 382, ECXF 380, ECF 378, ECF 384]; Dkt. No. 387
 24 [containing ECF 379, 383, 380, 384].) Accordingly, having submitted its lien for its services and
 25 those of the experts and consultants retained by Defendants (Dkt. No. 388) Buchalter joins in
 26 Defendants' Motion for Attorneys' Fees.

1 7. Similarly, upon withdrawing, we provided to Defendants’ counsel our working
2 file. As set forth below, several facts and events relevant to the bad faith issue require further
3 supplemental sworn testimony. Accordingly, Buchalter is joining in and supplementing the
4 instant motion.

5 8. I have litigated hundreds of trade secrets disputes, and this matter was both
6 objectively specious and brought or maintained for an improper purposes.

7 **A PARTNERSHIP DISPUTE MASQUERADING AS A TRADE SECRETS CLAIM**

8 9. Buchalter was retained by Defendants after I had a meeting with Mr. Wang at RF
9 Biotech’s offices in Hayward, California. From the outset, it was obvious this was a partnership
10 dispute masquerading as an action under the DTSA to invoke federal question jurisdiction. Both
11 companies were literally across the parking lot from each other and had engaged in a joint venture
12 for several years. For years they had shared employees, resources and had joint ownership. Mr.
13 Wang was part of the joint venture between Quintara Biosciences, Inc. (“Quintara”) and Ruifeng
14 Biztech, Inc. Aside from the claim under the DTSA, this was nothing more than a garden-variety
15 partnership dispute, which should have been brought in California’s state courts.

16 **OBJECTIVE SPECIOUSNESS**

17 10. I am the author of the chapter on the CACI 4400 Trade Secrets Jury Instructions in
18 the California Lawyers Association’s treatise entitled *Trade Secret Litigation & Protections: A*
19 *Practice Guide to the DTSA and CUSTA*. The threshold element of any trade secret claim is
20 ownership of the claimed trade secret. Under CACI 4400, which is entitled “Misappropriation of
21 Trade Secrets – Introduction,” the first line in the instruction is that:

22 **[Name of Plaintiff] claims that [he/she/non-binary pronoun/it] [is/was] the**
23 **[owner/licensee] of [general description of alleged trade secret[s]].**

24 11. From my experience, Quintara could not overcome the fundamental problem with
25 its case – Defendants were part of the joint venture, and thus Quintara had no exclusive
26 ownership of its claimed trade secrets. That alone rendered Quintara’s rabid crusade objectively
27 specious.

12. Indeed, that is precisely how the jury saw it. Quintara stumbled and fell on the first hurdle presented in the verdict form. (Dkt. No. 370.) The very first line of the Special Verdict Form provides:

1. Has Quintara proven, by a preponderance of the evidence, that the customer profile database was owned by Quintara, and not by Ruifeng or any other defendant, at the time of the alleged misappropriation?

Yes. _____ No. _____ X_____

13. Right out of the gate, I had significant doubts about the dubious merits of Quintara's claims. Quintara's Complaint (Dkt. No. 1) told a story about "interest free loans," "void agreements," and "void lease termination agreements." All of this seemed constructed to inflict harm on Mr. Wang's business which arose out of the implosion of the joint venture on March 9, 2020. As the Complaint acknowledged, Mr. Wang at that time asserted his interest in the assets of the joint venture in what Quintara claimed was a "fake Collaboration Agreement." (Dkt. No. 1, ¶ 36.)

QUINTARA LOSES THE INJUNCTION BASED ON LACK OF OWNERSHIP

14. *Five months* after the joint venture imploded, Quintara brought an *Ex Parte* Application for a Temporary Restraining Order and Order to Show Cause re: Preliminary Injunction. (Dkt. No. 11.) Again, Quintara told its tale about "void agreements," "fake collaboration agreements," and the like. The Temporary Restraining Order was denied, and a hearing set on Quintara's Motion for a Preliminary Injunction. (Dkt. No. 13.)

15. Quintara forced Ruifeng to incur the expense of opposing the preliminary injunction. In doing so, we worked with Mr. Wang, who spoke only Mandarin through an interpreter or through my esteemed colleague, Ms. Tiffany Ng, who fortunately is fluent in Mandarin and Cantonese. From the outset, we underscored the importance of the Cooperation Agreement, which was Exhibit A to Mr. Wang's Declaration in Support of Opposition to Preliminary Injunction. (Dkt. No. 17, pt. 5, ¶¶ 12-15.) Under the Cooperation Agreement, "Mr. Shan and [Mr. Wang] formalized the terms of the joint venture between Quintara and Ruifeng,"

1 by which “Ruifeng would own 51% of the joint venture with Ruifeng managing its bank
2 accounts, while Quintara would own 49% of the joint venture and manage the operational aspects
3 of the business.” (Dkt. No. 17, pt. 5, ¶¶ 13.)

4 16. Under the Cooperation Agreement, Ruifeng was acknowledged as “an overseas
5 investment,” and in exchange for its investment, Quintara guaranteed an annual rate of return of
6 3.5 percent for the first two years, and a rate of return after the first two years of five (5) percent.
7 (Dkt. No., 17, pp. 4:18-22.) Likewise, Defendants opposed the preliminary injunction on the
8 grounds that the Contract for Services and the Services Agreement were evidence of the joint
9 venture’s existence and operations. (Dkt. No. 17, pp. 4:23-59; Dkt No. 17, Pt. 5, Exhs. B, C.)

10 17. In opposition to the Motion for Preliminary Injunction, Mr. Wang also set forth
11 scores of admissions by Quintara’s principals that “Ruifeng and Quintara are true partners,” that
12 “[u]ltimately, the companies involved in these partnerships have grown and established a strong
13 American customer base creating more jobs and opportunities,” and that the partnership had been
14 in effect for approximately six (6) years. (Dkt. No. 17. Pt. 5, Exhs. D-F.)

15 18. On September 9, 2020, the Court denied Quintara’s Motion for a Preliminary
16 Injunction. (Dkt. No. 19.) In doing so, the Court faulted Quintara’s principals for their entangled
17 and various “fake” and “void” agreements, and concluded that “defendants vigorously contest
18 (with ample documentation) nearly every aspect of plaintiff’s storytelling. On these unsettled
19 facts, we can hardly determine that plaintiff is likely to succeed on the merits.” (Dkt. No. 19, p.
20 1-2.) Likewise, the Court questioned whether Quintara’s claims belonged in federal court at all.
21 (Dkt. No. 19, pp. 4:13-16.)

22 19. I have been litigating exclusively trade secrets and employee mobility disputes for
23 nearly 28 years. In my experience, when the Plaintiff loses a preliminary injunction with the
24 Court doubting the merits of the dispute, most cases settle on reasonable terms. However, it
25 quickly became apparent that Quintara had no interest in resolving this dispute, and was adamant
26 about inflicting harm on its joint-venture partner. Quintara was on a crusade.

QUINTARA LOSES ON THE RULE 12(B)(6) MOTION

20. On September 8, 2020, Defendants filed a Rule 12(b)(6) Motion. (Dkt. No. 18.) Defendants argued that Quintara could not allege a claim for “fraud” based on the “oral loan agreement” advocated in the Complaint. In doing so, Defendants argued that Quintara’s tangled web of “fake” and “void” agreements revealed that it lacked sufficient facts to allege a fraud claim, and that Quintara was more of an accomplice than a victim to its purported fraud. (Dkt. No. 18, pp. 10:21-12:11.)

21. On October 16, 2020 the Court granted, in part, Defendants’ Rule 12(b)(6) Motion. In doing so, the Court dismissed Quintara’s fraud claim concluding that:

Here, Quintara’s conduct can be taken only as willful blindness to its circumstances. To repeat the complaint: Quintara took an unwritten one million dollar loan with significant strings attached from a new business partner in 2013, entered an illusory joint-ownership collaboration agreement shortly thereafter, and in 2017 agreed to a lease name swap, which Quintara’s own founders suspected to be illicit (Compl., Dkt. No. 1, at ¶¶ 14, 15, 19, 20, 22, 23). It is now 2020. A multi-million dollar technology company that proceeds through seven years of expansion, business deals, corporate and employee tax filings, along with unwritten million dollar loans, illusory collaboration agreements, and suspect real estate deals without consulting counsel has deliberately buried its head in the sand. Quintara’s *willful blindness to the circumstances* shining a spotlight on the alleged misconduct forecloses its justifiable reliance on Wang’s misrepresentations, however intentional, and undermine its fraud claim.

(Dkt. No. 28, p. 4:8-18, emphasis added.)

22. At that point, with Judge Alsup flatly rejecting Quintara’s claims about the various contracts, Quintara should have ended this dispute. However, their agenda was never to address the merits of the claims, and Quintara kept on actively litigating its claims hoping to harm an upstart competitor.

23. Underscoring the fact that this was nothing more than a partnership dispute, on January 5, 2021, Defendants and Counter-Claimants Ruifeng and Mr. Wang filed their Counter-Claim seeking: (1) Declaratory Relief; (2) Breach of Fiduciary Duty; (3) Imposition of Constructive Trust, Order of Conveyance and Preliminary Injunction; (4) Money Due; (5) Conversion; (6) Breach of Duty of Loyalty; (7) Unfair Competition Under California Business &

1 Professions Code § 17200; (8) Breach of Contract; (9) Account Stated; (10) Unjust Enrichment;
 2 (11) Accounting; (12) Dissolution of the Joint Venture; (13) Defamation/Trade Libel;
 3 (14) Interference with Prospective Economic Advantage; and (15) Interference with Contract.
 4 (Dkt. No. 55, Pt. 1.) The Counter-Claim alleged the existence of the joint venture and the souring
 5 of the parties' ownership interests in the joint venture. (Dkt. No. 55, ¶¶ 8-45.)

6 **SEVERAL OF QUINTARA'S TRADE SECRETS ARE DISMISSED FOR FAILING TO**
 7 **IDENTIFY THEM WITH REASONABLE PARTICULARITY**

8 24. Because Quintara refused to identify its trade secrets with reasonable particularity,
 9 Defendants brought a Motion for a Protective Order seeking to preclude it from proceeding with
 10 discovery relating to the alleged trade secrets. (Dkt. No. 31.) To begin that motion, Defendants
 11 argued, "As the Court will recall, this is a garden-variety partnership dispute masquerading as a
 12 'trade secrets' claim so that Quintara can invoke federal question jurisdiction." (Dkt. No. 31, p.
 13 6:3-4.) In seeking a protective order, Defendants submitted the Declaration of Mr. Wang, who
 14 underscored the fact that "Ruifeng had access to and partial ownership of all information or
 15 technology developed as part of the joint venture." (Dkt. No. 31, p. 8; Dkt. No. 31, pt. 2, ¶ 4
 16 ["Defendants are unable to ascertain whether the alleged trade secrets are limited to what was
 17 solely the property of or in the possession of the joint venture."].)

18 25. On November 18, 2020, the Court granted in part Defendants' Motion for a
 19 Protective Order and ordered Quintara to file and serve: "(1) a summary of the specific trade
 20 secret; (2) the background of the trade secret and a description of how each secret has derived
 21 independent, actual or potential economic value by virtue of not being generally known to the
 22 public; (3) a description of how each secret has been the subject of reasonable efforts to maintain
 23 its secrecy; and finally (4) each of the precise claimed trade secrets, numbered, with a list of the
 24 specific elements for each, as claims would appear at the end of a patent." (Dkt. No. 40, p. 2:2-
 25 7.) In doing so, the Court precluded Quintara from "taking any discovery at all until a
 26 satisfactory statement has been filed on counsel for defendants. (Dkt. No. 40, p. 2:8-10.) That
 27 Order was critical because it forced Quintara to comply with each of the four requirements.
 28

26. At that time, despite having been made aware of five (5) Northern District cases which followed California Code of Civil Procedure section 2019.210, Quintara's counsel obstinately refused to comply and disregarded the Northern District's "practical approach" under California Code of Civil section 2019.210 requiring plaintiffs to identify with "reasonable particularity" the allegedly misappropriated trade secrets before conducting discovery relating to the trade secret. (Dkt. No. 31, pp. 10:11-14:2) Quintara's "trade secrets" fell into three categories – Customer and Vendor Information (Topics Nos. 1-2, 6); Quintara's Business Plans (Topics Nos. 3-5) and Technical and Scientific Information (Topics Nos. 7-10).

27. In addition to seeking a protective order under Section 2019.210, Defendants brought a Motion to Exclude Evidence Not Disclosed in Plaintiff's Initial Disclosure, or Alternatively to Compel Full Compliance with Rule 26. (Dkt. No. 36, pt. 1.) Leading into that dispute, I wrote to Quintara's counsel expressing my considerable concern that it was prosecuting this dispute in bad faith. A true and correct copy of my December, 2021 email to Plaintiffs' counsel citing *Swarmify, Inc. v. Cloudflare, Inc.*, is attached hereto as **Exhibit 1**. In doing so, Defendants argued in their Motion to Exclude Evidence Under Rule 26:

Plaintiff is engaging in a pattern of deceptive conduct. Plaintiff opted to file this lawsuit and burden this federal Court with a routine partnership dispute that belongs in state court. Plaintiff next unsuccessfully sought a TRO to shut down a competitor who it formed a joint venture with pursuant to a written agreement. Similar to Plaintiff's inadequate effort to comply with CCP Section 2019.210 (necessitating another pending motion), Plaintiff served inadequate initial disclosures violating this Court's Order. It is apparent from Plaintiff's initial disclosures that Plaintiff is either trying to hide its evidence or trying to manufacture a case after filing its complaint. Defendants ***have grave concerns that Quintara is litigating its "trade secret" claim in bad faith***, and Quintara's pattern of evasive, wasteful, time-consuming tactics validate Defendants' concerns. *Swarmify, Inc. v. Cloudflare, Inc.*, 2018 U.S. Dist. LEXIS 168317, *6 (N.D. Cal. Sep. 28, 2018)

(Dkt. No. 36, p. 2:14-23, emphasis added.)

28. On December 22, 2020, the Court ruled on Plaintiff's Motion seeking to exclude evidence under Rule 26. (Dkt. Nos. 50, 53.) In doing so, the Court set up a mechanism by which Defendants could move to strike Quintara's trade secrets claim if it continued to provide an

1 evasive or deficient description of the claimed trade secrets. (Dkt. No. 50.) As part of that ruling,
 2 Judge Alsup invited Defendants to stop playing “tee-ball” and bring a motion to strike Quintara’s
 3 trade secret claims.

4 29. After failing to comply with the Court’s November 18, 2020 Order, Defendants
 5 brought their Motion to Strike (Dkt. No. 57) under the Court’s December 22, 2020 Order. (Dkt.
 6 No. 50.) Quintara’s amended disclosure under Section 2019.210 was fraught with improper
 7 qualifying language and catch-all phrases. (Dkt. No. 57, pp. 13:1-10.) Defendants also argued
 8 that Quintara’s categories of its trade secrets (*i.e.*, Business and Sales Information, Technical and
 9 Scientific Information) did not comply with the Court’s November 18, 2020 Order. (Dkt. No.
 10 40.)

11 30. Again, in its Motion to Strike, Defendants stated that they “have grave concerns
 12 that Quintara has been prosecuting its Defend Trade Secrets Act claim in ‘bad faith,’ thereby
 13 justifying an award for Defendants’ attorneys’ fees and costs. *Swarmify, Inc. v. Cloudflare, Inc.*,
 14 No. C 17-06957 WHA 2018 WL 4680177 (N.D. Cal. Sept., 28, 2018).” (Dkt. No. 57, p. 8, fn. 2.)
 15 When addressing the impact of the Court’s order on discovery, I again cautioned Quintara’s
 16 counsel about prosecuting its claims in bad faith under the DTSA. Attached hereto as **Exhibit 2**
 17 is a true and correct copy of my January 13, 2021 email citing to *Flir Systems, Inc. v. Parrish*.

18 31. On March 13, 2021, the Court struck (Dkt. No. 87) all of Quintara’s trade secrets
 19 claims except for its customer profile and vendor databases. (Dkt. No. 87, pp. 3:16-7:13.) Stated
 20 otherwise, nine (9) of Quintara’s eleven (11) “trade secrets” were stricken. In doing so, the Court
 21 expressed its skepticism over the supplemental jurisdiction of Quintara’s state-law claims. With
 22 only two of its eleven (11) claimed trade secrets intact, the Court stayed the parties’ state law
 23 claims out of concerns that its “slew of state-law claims threatens to swallow the sole federal
 24 claim here.” (Dkt. No. 87, p. 7:26-27.)

25 32. On May 27, 2021, the Court issued its Response by District Court to Mandamus
 26 Petition. (Dkt. No. 140.) At that time, the Court explained its rationale in requiring that Quintara
 27
 28

1 comply with Section 2019.210, and in striking its trade secrets claims for not complying with the
2 Court's November 18, 2020 Order. (Dkt. Nos. 40, 57.)

3 33. At that point, a reasonable litigant would have set down its sword, but Quintara
4 opted to continue with its pleadings in tatters. Instead, Quintara filed a Petition for Writ of
5 Mandamus before the Ninth Circuit Court of Appeals. (Dkt. No. 129.)

6 34. At the request of the Ninth Circuit, on May 26, 2021, Defendants filed an Answer
7 to Petition for Writ of Mandamus. (See Dkt. No. 9, *In re: Quintara Biosciences, Inc. v. United*
8 *States District Court, Northern District of California*, United States Court of Appeals for the
9 Ninth Circuit, Case No. 21-70913.) The central issue in Quintara's appeal was whether Judge
10 Alsup erred in dismissing nine of Quintara's claimed "trade secrets" resulting from its failure to
11 comply with the Court's November 18, 2020 Order. (Dkts. No. 40, 57.) On June 8, 2021, after
12 forcing Defendants to incur more expenses before the Court of Appeals, the Court denied
13 Quintara's Writ Petition. (Dkt. No. 151.) As a result, all of Quintara's state court claims were
14 stayed, and only two of its eleven "trade secret" claims" moved forward under federal question
15 jurisdiction. Further, as a result of Defendants' motion practice, the Court now has a tested
16 mechanism to dispose of trade secret claims where the plaintiff fails to abide by the Court's
17 orders requiring their disclosure be made with particularity.

18 DISCOVERY COMMENCES

19 35. With the appeal pending, the parties commenced discovery. Almost instantly,
20 Quintara took a myopic view of the case, refusing to engage in discovery showing that there was,
21 in fact, a joint venture. On January 13, 2021, I again warned Quintara's counsel that its
22 obstreperous conduct evidenced its bad faith prosecution of the DTSA claim. Attached hereto as
23 **Exhibit 3** is a true and correct copy of my January 13, 2021 email citing *Flir Systems, Inc. v.*
24 *Parrish*.

25 36. Worse yet, Quintara took the position that even though the Court's March 13, 2021
26 order stayed both sides' state-law claims, and dismissed its fraud claim, that it could still conduct
27 discovery relevant to those claims. Quintara's goal was obviously to cut a wide swath into the
28

1 facts, and force Defendants to respond to discovery which had nothing to do with the two
 2 remaining trade secrets claims. Yet again, I cited to *Swarmify, Inc. v. Cloudfare, Inc.* about
 3 Quintara's sharp practices. Attached hereto as **Exhibit 4** is a true and correct copy of my March
 4 15, 2021 email exchange with Quintara's counsel.

5 37. On March 23, 2021 I wrote to Quintara's counsel as follows:

6 Jim

7
 8 Quintara originally took the position that CCP 2019.210 didn't even apply to its
 9 federal trade secret claim. As of March 13, 2021, nine of eleven of its DTSA trade
 secrets were dismissed.

10 After stating the databases consisted of SQL files (indeed your associate even
 11 referenced MySQL), Quintara produced no such files. This is the type of "shifting
 12 sands" about which Judge Alsup cautioned.

13 The Court also threw out Quintara's fraud claim, yet it remains bent on re-
 14 litigating those issues. I'll call "bad faith" when I see it.

15 When is Quintara going to identify which produced files comprise its two
 16 remaining trade secrets?

17 38. Attached hereto as **Exhibit 5** is a true and correct copy of my March 23, 2021
 18 email exchange with Quintara's counsel. Instead of producing the SQL files, Quintara produced
 19 thousands of irrelevant documents, all of which were improperly designated as "Confidential-
 20 Attorneys' Eyes Only" and had nothing to do with the customer profile or vendor databases. I
 21 concur with Defendants' current counsel that Quintara grossly over-designated records under the
 22 protective order and used it as a weapon to escalate costs. The Court should consider that, along
 23 with my March 23, 2021 email to Quintara's counsel, as evidence of Quintara's bad faith.
 24 Attached hereto as **Exhibit 6** are true and correct copies of my emails to Quintara's counsel dated
 25 March 23, 2021 citing to *Flir Systems, Inc. v. Parrish*.

26 39. Defendants continued to force Quintara to describe which, if any, of the customer
 27 and vendor database files were its claimed "trade secret." In doing so, Quintara sent an email
 28

1 claiming that its customer profile database and vendor databases “includes” specific bates
2 numbered files. I wrote back to Quintara as follows:

3
4 It is unbelievable that for deposition notices, which were served originally on
5 November 24, 2020, that two days before a scheduled deposition Quintara still
6 cannot determine what are its alleged trade secrets. As Judge Alsup wrote in
Swarmify, Inc. v. Cloudflare, Inc., No. C 17-06957 WHA, 2018 U.S. Dist. LEXIS
91333, *8 (N.D. Cal. May 31, 2018).

7 Gamesmanship, even if well-disguised at the outset, tends to come into
8 clearer focus as litigation progresses. For example, it becomes easier to
9 pinpoint how vaguely-alleged trade secrets may have functioned as
10 moving targets, and how the plaintiff may have taken advantage of the
11 shifting sands of litigation to evade counterarguments. These
12 developments may cast the unreasonableness of the initial disclosure into
13 sharp relief in light of how the alleged trade secrets evolved over time. In
14 such cases, a plaintiff that merely postpones reckoning with Section
2019.210 early on may eventually find that the consequences of their
15 evasions come home to roost in the form of an adverse ruling on the entire
16 trade secret misappropriation claim. See, e.g., *Waymo*, 2017 U.S. Dist.
LEXIS 182197, 2017 WL 5000352, at *7-9. As the February 27 order
17 foreshadowed, Swarmify has already gone quite a ways down this path.

18 40. Attached hereto as **Exhibit 7** is a true and correct copy of my March 24, 2021
19 email to Quintara’s counsel.

20 41. Quintara also named as a Defendant Ray Shao, who was nothing more than a
21 laborer at the joint venture. He never interacted with customers or vendors and never had access
22 to the customer database, and we offered to provide a sworn declaration to that effect. Mr. Li,
23 responded “No, we are not dismissing him.” Attached hereto as **Exhibit 8** is a true and correct
24 copy of my March 30, 2023 email to Mr. Li. Mr. Shao had merely gone to work with Mr.
Wang’s company after March 9, 2020 and there was no evidence whatsoever that he engaged in
25 any wrongdoing. Quintara’s refusal to dismiss him smacked of bad faith.

26 EXTENSIVE COMPUTER FORENSIC DISCOVERY

27 42. In late March, rather than serve inspection demands for the files it claimed
28 constituted its trade secrets to determine if they were even within the possession, custody or

1 control of the Defendants, Quintara served demands to forensically inspect the computers of all of
 2 the Defendants. Obviously, Quintara engaged in this tactic knowing it would be expensive and
 3 disruptive for Defendants to forensically image a multitude of computers – with no evidence the
 4 files were there in the first place. Yet again, I wrote to Quintara’s counsel expressing my
 5 concerns about this bad faith, scorched earth tactic. Attached hereto as **Exhibit 9** is a true and
 6 correct copy of my March 31, 2021 email exchange with counsel for Quintara. Quintara’s
 7 counsel even compared our adherence to the Court’s March 13, 2021 order as “Dr. Goebbels
 8 theory of propaganda” which I found offensive given my Jewish heritage.

9 43. Quintara took the issue before Magistrate Judge Tse, who largely concurred with
 10 Defendants and rejected Quintara’s request to forensically image eleven computers. (Dkt. No.
 11 109.) Magistrate Judge Tse forced Quintara to provide a detailed description of what to search
 12 for on the computers, and gave Defendants through April 23, 2021 to complete the forensic
 13 review. (Dkt. No. 109.) To comply with Magistrate Judge Tse’s Order, Defendants incurred the
 14 expense of hiring a computer forensic vendor.

15 44. On April 16, 2021, Quintara’s counsel provided Defendants with a detailed list
 16 consisting of **922 files** including the Bates numbers for what Quintara claimed comprised its
 17 customer profile and vendor database. Later that same afternoon, in what can best be
 18 characterized as “shifting sands,” after identifying the 922 files comprising the customer profile
 19 and vendor database, **Quintara added another 10,000 files**. It seemed astonishing at the time that
 20 Quintara could originally identify 922 files and then shift course to claim that more than 10,000
 21 additional files were its “trade secret.” Given the time constraints imposed by Magistrate Judge
 22 Tse to comply (Dkt. No. 109), we focused our efforts around the 922 files initially identified by
 23 Quintara.

24 45. On April 23, 2021, Defendants reported back that all 16 computers and servers had
 25 been searched and “Out of the 922 files, we located one file (QB007896) which was present on
 26 multiple devices.” A true and correct copy of my April 23, 2021 email to Quintara’s counsel is
 27 attached hereto as **Exhibit 10**. For that one file, the metadata showed that it was last accessed on
 28

1 February 18, 2015. At that time, I wrote to Quintara's counsel demanding the dismissal with
 2 prejudice of the DTSA claim and again warning about the recovery of fees for the bad faith
 3 continued prosecution.

4 46. Of course, Quintara refused to dismiss its DTSA claim, and instead doubled down
 5 on a wide-array of discovery disputes before Magistrate Judge Tse.

6 **A MULTITUDE OF DISPUTES BEFORE MAGISTRATE JUDGE TSE**

7 47. On April 4, 2021, the Court referred the discovery to Magistrate Judge Tse. (Dkt.
 8 No. 102.) Implementing Quintara's plan to force Defendants to incur expenses on time
 9 consuming and wasteful discovery issues, Magistrate Judge Tse entered orders dated April 16,
 10 2021 (Dkt. No. 109), May 5, 2021 (Dkt. No. 121), May 6, 2021 (Dkt. No. 122), May 10, 2021
 11 (Dkt. No. 123), May 14, 2021 (Dkt. No. 130), May 14, 2021 (Dkt. No. 131), May 14, 2021 (Dkt.
 12 No. 132), June 9, 2021 (Dkt. No. 149), June 14, 2021 (Dkt. No. 154), June 30, 2021 (Dkt. No.
 13 164). By June 9, 2021 Magistrate Judge Tse cautioned the parties about the multitude of
 14 discovery issues. (Dkt. No. 145.) By June 9, 2021, Magistrate Judge Tse had addressed thirteen
 15 (13) discovery letters in this contentious matter. (Dkt. No. 150.) Among those, discovery letters
 16 Defendants were ordered to re-image certain hard drives, and produce those to Plaintiffs. (Dkt.
 17 No. 122.) That order was affirmed by Judge Alsup on June 14, 2021. (Dkt. No. 154.)

18 **CONTENTIOUS DEPOSITIONS**

19 48. Several of the depositions were extremely contentious, and Quintara attempted to
 20 delve into areas which had no bearing on the claimed misappropriation of its Customer Profile or
 21 Vendor Database. During the deposition of Gangyou Wang, he was asked to address questions
 22 about the potential revocation of his immigration visa. Attached hereto as **Exhibit 11** is a true
 23 and correct excerpt of the April 22, 2021 deposition of Gangyou Wang (pp 76:20-77:11, 88:13-
 24 89:10). Quintara's questioning was purely harassing, and I instructed Mr. Wang not to answer.

25 49. Similarly, Quintara's obvious goal was to ask Ruifeng's witnesses about numerous
 26 topics unrelated to the two remaining trade secrets claims. Doing so enabled Quintara to waste
 27 time and force a competitor to sit for hours of examination on inane topics such as how the
 28

1 witness was able to access the Zoom deposition. Attached hereto as **Exhibit 12** is a true and
 2 correct excerpt of the deposition of Rui Shao, where I again had to reference *Flir* and actually
 3 attached a copy of *Flir Systems, Inc. v. Parrish decision* during the course of the deposition (pp
 4 108:13-109:25, 122:2-123:7, and Exhibit 36 thereto). Likewise, attached hereto as **Exhibit 13** are
 5 pp 11:21-15:1 of the deposition of Dr. Yi Quan Chen, where Quintara's counsel sought to harass
 6 a witness when he asked for an interpreter. Again, I made my record citing to *Flir Systems, Inc.*
 7 *v. Parrish*.

8 50. Throughout April of 2021, I continued to question Quintara's counsel's motives
 9 and their apparent lack of objectivity. On April 6, 2021, I wrote to Quintara's counsel because
 10 they were insisting that Defendants respond to interrogatories that the Court had previously ruled
 11 were improper. Attached hereto as **Exhibit 14** is a true and correct copy of my email faulting
 12 Quintara for its "purely obstreperous, expensive, wasteful tactics" which showed that "Quintara is
 13 maintaining its DTSA claim in bad faith."

14 51. Keeping up with its purely obstreperous tactics, on April 23, 2021 Quintara
 15 abruptly ended the Rule 30(b)(6) deposition of Alan Li, and halted his personal testimony.
 16 Notably, Quintara took Ruifeng's and Mr. Li's deposition, ***and did not ask him any questions***
 17 ***about the customer profile or vendor databases***. I sent an email on April 23, 2021 confirming
 18 that Quintara was obviously proceeding in bad faith by failing to question Mr. Li about the central
 19 (and only remaining) issue in the case. Attached hereto as **Exhibit 15** is a true and correct copy
 20 of my April 23, 2021, email to Quintara's counsel. I wrote a follow-up message on April 26,
 21 2021 which also addressed my concerns about abandoning Mr. Li's deposition and Defendants'
 22 concerns about the bad faith prosecution of Quintara's claims. Attached hereto as **Exhibit 16** is a
 23 true and correct copy of my email dated May 26, 2021.

24 52. Attached hereto as **Exhibit 17** is a true and correct copy of my April 26, 2021
 25 email correspondence expressing:

26 This case has no merit, and is being pursued for an improper purpose. We will
 27 continue to make our detailed record of your firm's prosecution. What is
 28 unprofessional is your lack of objectivity.

EXPERT DISCOVERY

53. Quintara’s reliance upon its principal’s brother as a damages expert reveals Quintara’s true intention – to force its competitor to incur the expense of a battle-hardened rebuttal expert, while having an unqualified person opine about its damages. Quintara claimed millions in damages, but it either could not find, or did not want, a credible expert to testify about its damages. At the time, Mr. Kimura opined about royalties, not realizing that royalties are only available under the DTSA where the jury cannot ascertain both “actual losses” or “unjust enrichment.” (18 U.S.C. § 1836(b)(3) [“in lieu of damages measured by any other methods, the damages caused by the misappropriation measured by imposition of liability for a reasonable royalty for the misappropriator's unauthorized disclosure or use of the trade secret.”].) Thus, Mr. Kimura was effectively admitting Quintara’s damages were not provable, nor was any unjust enrichment attributable to the misappropriation. Continuing to pursue a claim where the plaintiff’s own expert inadvertently acknowledges damages are not available strongly evidences bad faith.

54. Meanwhile, Defendants hired Maryellen Sebold from RSM US as their damages expert. Yet again, on June 23, 2023, I had to caution Quintara’s counsel citing *Flir Sytems, Inc. v. Parrish* after it abandoned Ms. Sebold’s deposition, claiming that her \$610 rate was too high. Attached hereto as **Exhibit 18** is a true and correct copy of my June 23, 2023 email message to Quintara’s counsel.

55. Further, on July 8, 2021, Defendants provided the supplemental report of their own computer forensic expert. That report revealed that even though Quintara had originally claimed that its customer profile and vendor database consisted of 922 files, those records were actually created after March 9, 2020, the date the joint venture imploded. Obviously, if those records did not exist when the joint venture imploded, there would be no way for Defendants to have “misappropriated” the trade secrets. I wrote to Mr. Li on July 8, 2021 to express my concern that Quintara had manufactured evidence. Attached hereto as Exhibit 19 is a true and correct copy of

1 my July 8, 2023 email message, again citing to the bad faith decisions of *Flir Systems* and
 2 *Swarmify*.

3 **BUCHALTER WITHDRAWS AS COUNSEL**

4 56. On September 11, 2021, Buchalter filed its Motion to Withdraw as counsel for
 5 Defendants. (Dkt. No. 214.) By that point the case had been narrowed down from multiple
 6 causes of action to just two claimed trade secrets of Quintara. The value we had conferred was
 7 apparent and from the very outset of the case, Defendants argued Quintara's trade secret case was
 8 baseless because of their participation in the joint venture. Indeed, the very first Exhibit offered
 9 by Mr. Wang when Defendants' opposed the Motion for Preliminary Injunction was the
 10 Cooperation Agreement. (Dkt. No. 17, pt. 5, ¶¶ 12-15.)

11 **THE RATES CHARGED WERE REASONABLE**

12 57. Buchalter is a mid-market firm, consisting of ten (10) west coast offices. I was
 13 previously a shareholder in one of the large, global law firms, and we staff cases efficiently with
 14 one or two associates and one shareholder. I was the only shareholder, and depending on the
 15 availability of Mr. Carr or Ms. Ng, they handled a considerable amount of the day-to-day
 16 workings of the case. I provided strategic direction and handled most of the hearings and
 17 depositions. At the time, my hourly rate was \$620. Compared to other trade secrets litigators my
 18 rate is rather low, but I split my time between San Francisco and Sacramento so my rate keeps me
 19 competitive on both markets. Given my extensive trial experience, including an eight week jury
 20 trial followed by a one week bench trial, my rate is reasonable for the level of my experience.

21 58. Mr. Carr's rate was \$540 and Ms. Ng's rate was \$385 for this matter. Both of their
 22 rates were competitive with those of similar senior level attorneys. They are both exceptionally
 23 talented tacticians and we needed Mr. Carr's experience on litigating partnership disputes with
 24 which he is extremely talented and experienced. Ms. Ng worked for months on this case from
 25 China, during the middle of the night. We had our conference calls and deadlines set for Pacific
 26 Standard Time, and Ms. Ng provided her valuable insight from across the Pacific. Months after
 27
 28

1 the matter commenced, I came to learn she was in China and was amazed by her selfless
 2 dedication to this client.

3 **THE WORK PERFORMED WAS REASONABLE AND AUTHORIZED**

4 59. This was a very contentious matter of dubious merit. Ultimately, Quintara could
 5 do nothing about the facts of the case. Despite its claims of “void” and “fake” agreements, it had
 6 valid, binding contracts which formed a joint venture. The truth was always going to be crippling
 7 to Quintara. This was a bitter partnership divorce desperately in search of a basis for federal
 8 question jurisdiction. I was relieved, but not entirely surprised, to learn that Defendants obtained
 9 a verdict in their favor. It appears that Quintara abandoned one of its remaining two trade secrets
 10 before the trial commenced.

11 60. All of the work that we performed was authorized and reasonable. We spent a
 12 considerable amount of time using Google Translate, and the skills of Ms. Ng and Ms. Mimi
 13 Lian, our interpreter, to help us communicate with Mr. Wang who was the primary decision-
 14 maker. As Defendants, most of the services performed were in response to the positions taken by
 15 Quintara. There were, along the way, a few motions where we were not successful, but that does
 16 not change the fact that the efforts we undertook were reasonable. Likewise, the success (or
 17 failure) of motions to which we had to respond does not change the fact that Quintara had no
 18 basis to bring this lawsuit and pursued it hoping to run a competitor out of business.

19 61. Attached hereto as **Exhibit 20** are true and correct redacted copies of the invoices
 20 for this matter from Buchalter, P.C. to Ruifeng and Mr. Wang. I have redacted the entries to limit
 21 the scope of entries which reveal attorney client communications or work product protected
 22 entries.

23 62. Attached hereto as **Exhibit 21** are true and correct unredacted copies of the
 24 invoices for this matter from Buchalter, P.C. to Ruifeng and Mr. Wang.

25 63. Defendants retained HaystackID, which performed the forensic imaging and
 26 offered expert testimony on the computer forensics. Attached hereto as **Exhibit 22** are true and
 27 correct copies of HaystackID’s invoices for services rendered.

64. Defendants retained RSM US, LLC as a damages expert and to refute the testimony of Mr. Kimura. Attached hereto as **Exhibit 23** are true and correct copies of RSM US, LLC's invoices for the services by Maryellen Sebold.

65. Defendants retained Mimi Lian, Check Interpreter, Certificate No. 301079 to assist in several depositions, hearings, meetings and conferences. Attached hereto as **Exhibit 24** are true and correct copies of Ms. Lian's invoices.

APPORTIONMENT FOR FEES ASSOCIATED WITH THE COUNTERCLAIM

66. I have reviewed Buchalter's invoices and discounted them for entries which pertain to the Counter-claim. Some entries pertain to both the Counter-claim and the defense of the action. Accordingly, I have prepared a spreadsheet, which depicts the charges associated with the Counter-claim and discounted them based on what percentage of the work pertained to the Counter-claim. My calculations show that \$24,045.00 in fees were expended on the Counter-claim. The Counter-Claim and all of Quintara's state-law claims were stayed as of March 13, 2021. (Dkt. No. 87, p. 7:26-27.) Attached hereto as **Exhibit 25** is a true and correct copy of the Excel spreadsheet I prepared.

ADDITIONAL FEES

67. I worked 4.7 hours on Friday, July 28, 2023 to prepare my declaration. I spent another 7.2 hours on Sunday, July 30, 2023 to further edit and draft my declaration. I anticipate spending 3.5 hours on Monday, July 31, 2023 to finalize the declaration and to prepare Buchalter's lien. I also anticipate spending 3.5 hours to prepare for and attend the hearing on September 14, 2023. My current hourly rate is \$675 for a total of \$12,757.50 to be added on to Buchalter's total.

Executed this 31st day of July, 2023 in the State of California, in the County of Sacramento.



Dylan Wiseman

EXHIBIT 1

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 12/1/2020 1:51:15 AM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]; Carr, Brandon M. [bcarr@buchalter.com]; Smith, Amy [asmith@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]
CC: chenc@lilaw.us
Subject: RE: Quintara - Motion to Exclude Evidence

Quintara seems determined to recast the bad faith prosecution of its DTSA claim as "ordinary occurrences."

We await your response by tomorrow at Noon.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Monday, November 30, 2020 4:48 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>; Carr, Brandon M. <bcarr@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>
Cc: chenc@lilaw.us
Subject: RE: Quintara - Motion to Exclude Evidence

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>.

Dylan,

You are citing some ordinary occurrences of litigation to justify an extraordinary claim impugning the integrity of your litigation opponent. So we do not appreciate that tactic. We also disagree with your post facto meet and confer. Regarding the depositions, we told you about the difficulties for January. But we are still looking at both our calendar and clients' to decide whether we can squeeze some time for your noticed depositions. We should know sometime in December. We will also know about interpreter situation by then.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
 650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Monday, November 30, 2020 3:10 PM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>; Carr, Brandon M. <bcarr@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>
Cc: chenc@lilaw.us
Subject: RE: Quintara - Motion to Exclude Evidence

Jim

Quintara unsuccessfully sought a TRO claiming its "trade secrets" were misappropriated. Quintara then failed to describe its trade secrets, and was ordered to do so by December 3, 2020 at Noon. Concurrently, Quintara served its facially deficient Rule initial disclosures. We're justified in asserting that Quintara is playing hide-the-ball.

To be clear, we're not saying Quintara is "hiding evidence." Nobody is accusing Quintara of spoliation. Rather, we're claiming that Quintara is engaging in purposeful obfuscation. Quintara knows exactly what amounts to its supposed trade secrets, and it can comply fully with Rule 26, but has opted not to do so.

You have until tomorrow at Noon to reconsider whether Quintara's one-and-a-half page Rule 26 disclosure is sufficient.

Also, per Dan's message of this morning, this confirms that the written discovery served on Defendants is a nullity, and has been withdrawn.

Please also respond to my inquiry about the depositions going forward and whether the deponents require a translator.

Thank you,

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>

Sent: Monday, November 30, 2020 2:30 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>; Carr, Brandon M. <bcarr@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Cc: chenc@lilaw.us

Subject: RE: Quintara - Motion to Exclude Evidence

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

We don't appreciate your overly aggressive style of litigation. You filed a Rule 37 motion without any meet and confer, despite Dan's express invitation for meet and confer. And now, after we have filed our opposition, you seem to want to re-write the history about the meet and confer? Anyway, it is an established law that this kind of eleventh-hour meet and confer is far from meeting your obligation under which you are supposed to certify that you have done good faith meet and confer to try to resolve all issues before you filed your motion. Your belated meet and confer attempt does not in any way alleviate the impropriety of your motion.

I hope you will not twist the history of meet and confer in your reply. We ask you to submit both this email and Dan's email of today to Brandon Carr regarding the same issue to the Court together with your Reply.

Notwithstanding your baseless accusation, we are litigating this case similarly as we litigate all other cases. We have never had any opposing counsel who is as aggressive as you to file a motion for sanction for our ordinary initial disclosure. This is particularly disturbing in this case because your clients knew inside-out about Quintara. There is not much we can hide from your clients. So we do not appreciate your repeated allegation that we are hiding any evidence. We are litigating this case as responsibly as we litigate any other trade secret cases.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>

Sent: Monday, November 30, 2020 1:24 PM

To: Daniel Peterson <peter sond@lilaw.us>; Carr, Brandon M. <bcarr@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Cc: chenc@lilaw.us; lij@lilaw.us

Subject: RE: Quintara - Motion to Exclude Evidence

Dan

On Wednesday, November 25, 2020, you signed a declaration attesting to your personal knowledge about Quintara's initial disclosures. (Peterson Decl. ISO Opposition to Defs.' Motion for Sanctions, paras. 7-10.) Yet one business day later, on Monday, November 30, 2020, you now claim to be "not prepared to meet and confer" about Quintara's initial disclosures?

That aside, I remain doubtful that Judge Alsup will consider Quintara's page-and-a-half initial disclosure to be compliant with Rule 26.

Quintara has until tomorrow at Noon (Pacific) to agree to provide its fully compliant amended Rule 26 initial disclosures. That should afford Quintara ample time to reconsider its position. Please identify a date during the week of December 14th for Quintara to serve its fully-compliant amended Rule 26 initial disclosures.

Also, please let us know whether Quintara intends to proceed with the depositions we have set in January, and whether any of the witnesses require an interpreter.

Again, these types of games further fuel our concerns that Quintara is maintaining its DTSA claim in "bad faith." *Swarmify, Inc. v. Cloudfare, Inc.*, 2018 WL 4680177 (N.D. Cal. Sept., 28, 2018) (Judge Alsup ruling on DTSA bad faith claim).

Thank you,

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Daniel Peterson <petersond@lilaw.us>

Sent: Monday, November 30, 2020 12:29 PM

To: Carr, Brandon M. <bcarr@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Cc: chenc@lilaw.us; lij@lilaw.us

Subject: Quintara - Motion to Exclude Evidence

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Brandon,

I was a little surprised by your unscheduled call today regarding Defendants' Motion to Exclude Evidence.

In our call you reiterated your stance on the three issues we disagree on, but I did not provide any substantive discussion as I was not prepared to meet and confer today. The time to meet and confer regarding these issues would have been before you filed your motion. As we have filed our opposition and requested fees and costs for defending against your motion, the time to meet and confer is well passed.

You mentioned the possibility of withdrawing your motion.

We believe this motion was brought without substantial justification and we have already prepared and filed our opposition to this motion.

Even if you withdraw the motion now, we believe you will still be held accountable for the reasonable expenses and attorney's fees incurred in opposing the motion.

Regarding the issue of discovery.

No ex parte is necessary, we consider the discovery suspended according to the Court's order.

Thank you,

Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.251.4385. www.lilaw.us

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your

system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 2

Message

From: Wiseman, Dylan W. [/O=BNFY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=WISEMAN, DYLAN W.550]
Sent: 1/13/2021 3:57:26 PM
To: lij@lilaw.us; Carr, Brandon M. [/O=BNFY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Carr, Brandon M.66d]; Daniel Peterson [petersond@lilaw.us]
CC: Ng, Tiffany F. [/O=BNFY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ng, Tiffany F.613]; Smith, Amy [/O=BNFY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Smith, Amyc50]; chenc@lilaw.us
Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Jim

Before an opposition was even filed, Judge Alsup directed us to bring a motion to strike instead of a motion for a protective order. That's not denial, but rather a directive to stop playing "tee-ball" and play hardball, which we have done. Judge Alsup's order stated that he will address the pending discovery requests only if the motion to strike is not granted. Yet again, Quintara is trying to circumvent Judge Alsup's order.

Again, this type of conduct confirms that Quintara is maintaining its DTSA action in bad faith. *Flir Systems, Inc. v. Parrish*, 174 Cal. App. 4th 1279, 1278 (2009).

Of course, if it remains necessary, we will meet and confer telephonically after Judge Alsup rules on our pending motion to strike, and after assessing Quintara's written meet and confer letter as to all of Defendants' objections.

In the interim, we will expect Quintara will abide by the parties' agreement reached on January 12, 2021.

Dylan Wiseman

T (415) 227-3506
 C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Tuesday, January 12, 2021 5:33 PM
To: Carr, Brandon M. <bcarr@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us
Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

This message has originated from an External Email. lij@lilaw.us <lij@lilaw.us>:

Gentlemen:

You need to produce documents, too. You filed a motion for protective order which was denied. That literally means you cannot refuse discovery at this point. Your motion to strike is a pleading motion which does not allow one to unilaterally stay discovery. So you cannot sit on your obligations and keep calling us to produce documents. Dan was supposed to meet and confer with you on this, but I don't know if he did as I don't see you summarize that point. If not, I will meet and confer with you tomorrow and we will file a motion to compel afterwards. So please let me know when we can meet and confer on this matter tomorrow.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Tuesday, January 12, 2021 5:16 PM

To: Daniel Peterson <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Dan,

During our call today, you agreed:

1. By January 22, you will serve amended responses to Defendants' RFPD, Set One (so we can see what issues/requests remain that need to be decided by the court). These amended responses will comply with Rule 34 and will state if any documents are being withheld on the basis of any asserted objections;
2. By January 29, all responsive documents will be produced (no documents have been produced to date);
3. By this Friday, dates in March for depositions of Quintara, Mr. Shan, and Ms. Zhao (that you and the deponents are available).

If that does not comport with your understanding, let me know immediately.

Best,
Brandon

Brandon M. Carr | Attorney | **Buchalter**, A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Carr, Brandon M.

Sent: Monday, January 11, 2021 11:32 AM

To: 'Daniel Peterson' <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Dan,

Yes tomorrow at 4 pm works. Please call me at 415-216-8829.

Best,
Brandon

Brandon M. Carr | Attorney | [Buchalter](#), A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Daniel Peterson <petersond@lilaw.us>

Sent: Monday, January 11, 2021 10:52 AM

To: Carr, Brandon M. <bcarr@buchalter.com>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Brandon,

Thank you for your email and letter. I will prepare to discuss tomorrow.
Will you be available in the afternoon? I am free after 3:30pm tomorrow.

Before the holiday break, we spoke briefly about the format of production in light of Judge Alsup's Supplemental Order. You indicated that some documents should be produced as simple pdf (rolling production) and some should be produced in original format.

At that time I was not certain we had a mutual understanding of the production format called for in the Supplemental Order, but I said we would attempt to produce documents by the end of January.

After returning from the holiday break, Mr. Wiseman confirmed that Defendants' intend to adhere to Judge Alsup's Supplemental Order.

However, there is still some uncertainty in the Order that I would like to resolve at our meet and confer tomorrow. Based on my reading, the Order has some contradictory requirements, in that all pages of production should bear unique identifying control numbers on each page *and* that all files and records should be produced in their original form and sequence.

We have a potential solution we can discuss during meet and confer.

I believe we need to reach a mutual understanding on this issue so we can both proceed with preparing documents accordingly.

Best,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Monday, January 11, 2021 9:36 AM

To: Daniel Peterson <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Good morning Dan,

Following-up on my email below. Please advise a time you can meet and confer today or tomorrow (and will be prepared to do so).

The amended responses and documents are overdue. We need to resolve our issues now or move forward with a motion to compel.

Best,
Brandon

Brandon M. Carr | Attorney | **Buchalter**, A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Carr, Brandon M.

Sent: Friday, January 8, 2021 2:24 PM

To: 'Daniel Peterson' <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Dan,

Please see my comments in **red** in response to your letter.

Please let me know when you are available to talk by phone either this Monday or Tuesday. We need to understand exactly what Plaintiff is going to produce and what Plaintiff refuses to produce. The first time we spoke by phone (during a time we mutually scheduled) you were not prepared to discuss any specifics about why you believed the requests were overbroad, etc. Please be prepared this time to explain *your* objections if you intend to stand by them.

Also, we need a firm date that you will produce all documents and the amended responses (as explained in my previous letter your responses do not comply with FRCP 34).

We still have not received a single document from you – even though they are severely overdue, the discovery deadline is in a few months, and you told me when we spoke you would produce a rolling production (with hard copy files first, and then computer emails, etc. because those would take additional time to extract/prepare).

Best,
Brandon

Brandon M. Carr | Attorney | [Buchalter](#), A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Daniel Peterson <petersond@lilaw.us>
Sent: Wednesday, December 23, 2020 4:53 PM
To: Carr, Brandon M. <bcarr@buchalter.com>
Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us
Subject: RE: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Brandon,

Please find attached, my letter regarding your discovery requests.
I will be available in the new year to continue our meet and confer efforts.

Best regards and Happy Holidays!
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>
Sent: Friday, December 18, 2020 1:18 PM
To: Daniel Peterson <petersond@lilaw.us>
Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us
Subject: Re: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Yes, please call me at 415-216-8829. Thank you.

On Dec 18, 2020, at 11:03 AM, Daniel Peterson <petersond@lilaw.us> wrote:

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Hi Brandon,

Thank you.

Let's plan for Monday, will 4:00pm work for you?

I have a deposition for a separate case in the morning, but it should not take all day.

Best,

Dan

<image001.png>

Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.251.4385. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Friday, December 18, 2020 8:02 AM

To: Daniel Peterson <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: Re: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Dan: I am available today or Monday to meet and confer by phone. Let me know when you prefer. Best, Brandon

On Dec 17, 2020, at 3:11 PM, Daniel Peterson <petersond@lilaw.us> wrote:

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Dear Mr. Carr,

I have received and reviewed your letter, dated December 15, 2020.

I will be happy to meet and confer with you over the phone regarding the issues raised in your letter.

As discovery is just commencing, there is no need to rush a motion to compel here.

I will amend and supplement the responses pursuant to our meet and confer efforts accordingly.

My schedule tomorrow should be open for a call, I will also be in the office on Monday through Wednesday of next week.

Please let me know what time will work best for you.

Addressing the issues raised in your letter, I simply ran out of time to prepare all documents here, my discovery responses on December 14 preserve our objections. I am still in the process of collecting and preparing documents for production. I will endeavor to make a production of documents after the Holidays on January 15, 2021. If this is delayed for any reason, production will be made on January 31, 2021. I believe this is a reasonable timeline for producing documents as the cut-off for discovery is not until May of 2021. It is not our intention to delay or withhold any responsive documents here, we simply need more time to produce them.

Regarding the privilege log, the only documents we contemplate withholding on privilege are communications between the Plaintiff and his counsel for this matter. I understand it is customary to not require privilege logs for litigation counsel communications. We will not expect you to produce privilege logs for litigation counsel communication.

Regarding the requests to meet and confer to narrow the scope of 17, 18, 29, 33-36, 63, 64, 72-75, 90, and 91, I will prepare a separate letter to explain why the requests should be narrowed.

I am willing to meet and confer and discuss amending these responses to produce responsive documents.

Regarding requests No. 52-58, as Plaintiff has not decided on a theory of damages, these requests are premature and irrelevant for scrutinizing Quintara's damages (for example, if we decide to only seek unjust enrichment damages). However, I am willing to meet and confer and discuss amending these responses to produce responsive documents.

Regarding requests No. 59 and 87, which request information related to ANY assets owned by Quintara, the requests are overbroad and further irrelevant. Plaintiff is not contending Defendants converted ALL assets owned by Quintara, certainly no assets in its Boston Lab. If you are seeking information on assets which Quintara alleges have been converted, of course it will be provided. Again, I am willing to meet and confer and discuss amending these responses to produce relevant responsive documents.

Best regards,
Dan

<image001.png>

Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Smith, Amy <asmith@buchalter.com>

Sent: Tuesday, December 15, 2020 12:44 PM

To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Carr, Brandon M.

<bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Subject: Quintara Biosciences, Inc. v. Ruifeng Biztech Inc., USDC Northern District of California, Case No. 3:20-cv-04808 [IWOV-BN.FID3231313]

Good afternoon,

Please find attached a letter from Mr. Carr.

Thank you,
Amy

Buchalter

Amy Smith

Legal Assistant to Kevin Collins, Lisa Pleau-Fuller,
Jacqueline Vu and Dylan Wiseman
T (916) 945-5199

asmith@buchalter.com

500 Capitol Mall, Suite 1900
Sacramento, CA 95814-4737

www.buchalter.com

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination,

distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 3

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 1/13/2021 9:55:28 PM
To: Carr, Brandon M. [bcarr@buchalter.com]; Daniel Peterson [petersond@lilaw.us]
CC: Ng, Tiffany F. [tng@buchalter.com]; Smith, Amy [asmith@buchalter.com]; lij@lilaw.us; chenc@lilaw.us
Subject: RE: Case No. 3:20-cv-04808 (USDC, N. Cal.) – Defendants' Request for Production

In addition to Quintara's financials being relevant to **both** the counter-claim and Quintara's own claim for damages, Defendants have asserted multiple affirmative defenses which make relevant Quintara's financials. (See e.g., Answer to First Amended Complaint, Third, Fourth, Sixth, and Tenth Affirmative Defenses.)

Quintara's wasteful, obviously baseless, obstreperous maneuvering further confirms that Quintara is maintaining its DTSA claim in bad faith. *Flir Systems, Inc. v. Parrish*, 174 Cal. App. 4th 1270, 1279 (2009).

Dylan Wiseman

T (415) 227-3506
C (916) 212-6737

From: Carr, Brandon M.
Sent: Wednesday, January 13, 2021 1:42 PM
To: Daniel Peterson <petersond@lilaw.us>
Cc: Ng, Tiffany F. <tng@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us
Subject: RE: Case No. 3:20-cv-04808 (USDC, N. Cal.) – Defendants' Request for Production

Dan,

During our call yesterday you stated that your basis for refusing to produce all of these documents is Plaintiff "**does not believe there was a joint venture.**" As I explained, your clients "belief" about whether there is a joint venture is not a proper basis for withholding these relevant documents. You failed to identify any other reason why the requests are overbroad or unduly burdensome.

Indeed, our counterclaim alleges many facts about the joint venture making this a relevant issue in this case. Further, all of our requests are narrowed by a time frame starting when the joint venture began. You also are seeking lost profits as damages, making Quintara's financials relevant. My meet and confer letter explains why each of these requests is relevant and the documents should be produced.

Quintara is playing hide the ball. **It has been two months and we still don't have compliant discovery responses and a single document has yet to be produced by Plaintiff.** This is further evidence Quintara is prosecuting its case in bad faith.

If your amended responses, which are due next Friday, do not state Plaintiff will produce these responsive documents, we will be forced to move to compel.

Best,
 Brandon

Brandon M. Carr | Attorney | [Buchalter](#), A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Daniel Peterson <petersond@lilaw.us>

Sent: Wednesday, January 13, 2021 1:18 PM

To: Carr, Brandon M. <bcarr@buchalter.com>

Cc: Ng, Tiffany F. <tng@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: Case No. 3:20-cv-04808 (USDC, N. Cal.) – Defendants' Request for Production

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Dear Mr. Carr:

Thank you for speaking with me yesterday regarding discovery in this case.

I am emailing today to summarize the portion of our call where we addressed objections to your requests for production.

During our call we discussed several requests which I had objected to as being overbroad and unduly burdensome. It was my hope that we could negotiate to limit the scope of many of these overbroad requests. However, you did not offer to narrow the scope of the following requests:

RFPD No. 17 - Copies of all employee confidentiality agreements signed by YOUR current and former employees.

RFPD No. 29 - All contracts entered into by YOU from January 1, 2012 to the present.

RFPD No. 33 - All invoices issued to YOU from January 1, 2012 to the present.

RFPD No. 34 - All invoices issued by YOU from January 1, 2012 to the present.

RFPD No. 35 - Copies of all leases YOU are a party from January 1, 2012 to present.

RFPD No. 52 - YOUR balance sheets from January 1, 2012 to present.

RFPD No. 53 - YOUR profit and loss statements from January 1, 2012 to present.

RFPD No. 54 - YOUR income statements from January 1, 2012 to present.

RFPD No. 55 - YOUR statements of shareholder equity from January 1, 2012 to present.

RFPD No. 56 - YOUR bank account statements from January 1, 2012 to present.

RFPD No. 57 - YOUR credit card statements from January 1, 2012 to present.

RFPD No. 58 - Copies of all checks YOU signed from January 1, 2012 to present.

RFPD No. 59 - All DOCUMENTS RELATED TO any assets currently owned by YOU.

RFPD No. 63 - All DOCUMENTS RELATED TO the current valuation of YOUR company, including, but not limited to, any assets.

RFPD No. 72 - All agreements with between YOU and any IT service providers.

RFPD No. 73 - All invoices from any IT service providers to YOU.

RFPD No. 74 - All checks paid by YOU to any IT service providers.

RFPD No. 75 - All DOCUMENTS kept and maintained by Ms. Zhao RELATED TO YOUR financial condition.

RFPD No. 87 - All DOCUMENTS RELATED TO any property YOU contend is owned by YOUR Boston lab.

RFPD No. 90 - All COMMUNICATIONS with any PERSON RELATED TO this lawsuit.

These requests remain overbroad and unduly burdensome on their face.

For each request I expressed our intention to produce those relevant documents related to defendants and the issues of this case.

My goal has always been to reduce the overall burden while still locating materials whose relevance and importance justifies the burden.

However, you did not attempt to narrow the scope of these requests at all.

Again, Plaintiff remains open to meet and confer efforts on these issues.

Thank you,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

EXHIBIT 4

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/15/2021 8:50:13 PM
To: lij@lilaw.us; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Smith, Amy [asmith@buchalter.com]; docket [docket@buchalter.com]
CC: chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]; Daniel Peterson [petersond@lilaw.us]
Subject: RE: Urgent Request regarding Discovery Responses

Jim

We have invited you to identify what, if any, discovery is at issue before you intrude upon Judge Alsup. Please do so. Frankly, because of the two prior orders precluding Quintara from conducting discovery, I am doubtful that Quintara has served any discovery relating to the misappropriation of its customer and vendor lists.

Please identify the applicable discovery, and we can meet and confer about that discovery. I am not available today at 4:00. Should Quintara identify the discovery relating to the misappropriation of its customer and vendor lists, we can meet and confer about it tomorrow morning at 9:00.

Please add this email to your letter to Judge Alsup if you should decide to do so.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Monday, March 15, 2021 1:14 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; docket <docket@buchalter.com>
Cc: chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Daniel Peterson <petersond@lilaw.us>
Subject: RE: Urgent Request regarding Discovery Responses

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

No, we are required to meet and confer, unless you refuse to do that. So can we talk at 4 pm today?



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
 650.521.5956. www.lilaw.us.

From: lij@lilaw.us
Sent: Monday, March 15, 2021 1:08 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; docket <docket@buchalter.com>
Cc: chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Daniel Peterson <petersond@lilaw.us>
Subject: RE: Urgent Request regarding Discovery Responses

Dylan,

Regarding other things in your email, let me just make it clear that I have litigated trade secret cases for more than 20 years. I have no doubt as to the merits of our case. So please stop threatening us with attorney fees. We will let the case take care of itself. By the end, we will see who deserves the attorney's fees.

Also, you have not responded to our demand that you produce your discovery responses by end of this week, produce documents by end of this month and proffer your clients for deposition asap. What do you say about these demands? We want to have a meet and confer about this demand so that we can include them in our letter motion.

Let's talk at 4 pm this afternoon?

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>

Sent: Monday, March 15, 2021 12:52 PM

To: lij@lilaw.us; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; docket <docket@buchalter.com>

Cc: chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Daniel Peterson <petersond@lilaw.us>

Subject: RE: Urgent Request regarding Discovery Responses

Jim

Judge Alsup's March 13, 2021 order stayed all of the state court claims and counter-claims as supplemental claims. Your proposal obviously circumvents the Court's March 13, 2021 Order, and seeks to delve into the stayed supplemental state claims. We will not permit or partake in discovery which is barred by Judge Alsup's order. Please do not ask us to engage in the willful disobedience of Judge Alsup's order.

Judge Alsup's December 8, 2020 Order dismissed Quintara's fraud claim, concluding that it could not establish reasonable reliance *as a matter of law*. Thus, however framed, the purported "fraud" arising out of the "Oral Loan Agreement," the "Sham Collaboration Agreement," the "Sham Services Contract," the "Sham Lease Switch" and the like, has been dismissed. As a result, due to Quintara's inability to show its reasonable reliance, it cannot invoke the Defend Trade Secrets Act's "acquisition by improper means" standard to shoe horn its dismissed fraud allegations back into this dispute. 18 U.S.C. section 1839(6).

Equally important, Quintara's First Amended Complaint pleads that the misappropriation occurred on March 9, 2020:

68. Defendants have converted a total of 10 desktop computers and one server computer of Quintara. Defendants had ready access to the contents of computers immediately upon the conversion on March 9, 2020, because co-defendants A. Wong, Li, and Shao were granted access to the contents of the computers pursuant to their employment status with Quintara.

69. Defendants have the following Quintara's trade secrets contained in the computers which they have converted and are currently using:

The First Amended Complaint alleges a misappropriation through "improper means" as follows:

71. Defendants acquired the Confidential Information through improper means including conversion and breach of confidentiality agreement. Defendants A. Wong, Li, and Shao each signed a confidentiality agreement with Quintara which was entitled "Privacy Policy for Quintara Biosciences, Inc." (hereinafter the "NDA").

Quintara's irrelevant, dismissed "fraud" allegations have nothing to do with its pled misappropriation claim. Quintara's pled misappropriation claim pertains to the taking of its property on March 9, 2020 and alleged breaches of contracts.

Rest assured, should we prevail on the two remaining trade secrets claims, and this case is thrown out of federal court, Defendants will seek their attorneys' fees and costs under the Defend Trade Secrets Act's "bad faith" provisions. Your email from this morning establishes that Quintara is pursuing its claims in bad faith by seeking to undermine the Court's orders, and to smear rabidly Mr. Wang and Ruifeng. *Swarmify, Inc. v. Cloudfare, Inc.*, No. C 17-06957 WHA 2018 WL 4580177 (N.D. Cal. Sept. 28, 2018) (Judge Alsup awarding bad faith attorneys' fees under the DTSA).

The issues are now much more narrow. We do not see any reason to petition the Court to alter the current deadlines which have been in place for months. The "crisis" you mention below, is entirely of Quintara's own making.

We intend to proceed with the depositions next week as scheduled on the very limited issues remaining under Judge Alsup's March 13, 2021 Order.

If you have any other issues, please let me know.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>

Sent: Monday, March 15, 2021 10:50 AM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; docket <docket@buchalter.com>

Cc: chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Daniel Peterson <petersond@lilaw.us>

Subject: Urgent Request regarding Discovery Responses

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Hi Dylan,

I am sure by now you have read the Court's order regarding motion to strike and the case schedule. So the Court has set a very demanding schedule. We are to finish fact discovery by May 15 (and also expert report by that day).

By this email, we ask Defendants to properly respond to all our discovery requests related to the two trade secret claims. To be clear, to prove misappropriation, we will have to prove appropriation by improper means. That means all the discovery relevant to the sham agreements and all discovery relating to breach of duty of loyalty, to the extent relevant to proving improper means, must still be conducted by May 15.

By this email, we request proper responses to our discovery requests no later than the end of this week., i.e., by 3/19. All documents production should be completed by 3/31.

I need you to tell us whether you are on board with this proposed schedule. If not, we need to seek relief immediately. Please respond promptly to this email. We have a scheduling crisis in our hands and we need to properly handle this. By "we" I mean both parties.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 5

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/23/2021 11:23:58 PM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]
CC: Smith, Amy [asmith@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Bardon, Dana [dbardon@buchalter.com]; Smith, Amy [asmith@buchalter.com]
Subject: RE: Quintara vs. Ruifeng

Jim

Quintara's claims were dismissed by Judge Alsup for failing to comply with his prior order. Please do not attempt to engage in revisionist history by claiming "[t]here are many reasons why a claim may be dismissed or stayed." We're not saying that as of March 13, 2021 Quintara's claims are being maintained in bad faith, we're saying this partnership dispute never should have been in federal court from the beginning.

I am surprised that you would fault Defendants for not producing records. Quintara was barred from proceeding with **any discovery** until March 13, 2021. Even now, it can only proceed with discovery regarding the two remaining trade secrets claims. Tomorrow, we have the hearing before Judge Alsup regarding Defendants' written discovery.

Brandon and Dan met and conferred yesterday about Quintara's improper inspection demands which asked for forensic copies of its competitor's devices without any prior attempt to obtain the same information.

We need the identification of the files which comprise the databases and the emails which accompany whatever Quintara claims was misappropriated.

Dylan Wiseman

T (415) 227-3506
C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Tuesday, March 23, 2021 4:10 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan, we are doing our best to produce documents. Defendants have not produced anything so far. We have produced the trade secret files as far as I know. And we are in the process of producing more. When you will be producing any documents in this case? Is that bad faith litigation?

There are many reasons why a claim may be dismissed or stayed. If anytime that happens, it becomes bad faith, this country will be filled to the rim by bad faith.

Do whatever you think is professional way of litigating. I am just letting you know that I don't think you are being professional. But we will agree to disagree.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Tuesday, March 23, 2021 3:54 PM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

Jim

Quintara originally took the position that CCP 2019.210 didn't even apply to its federal trade secret claim. As of March 13, 2021, nine of eleven of its DTSA trade secrets were dismissed.

After stating the databases consisted of SQL files (indeed your associate even referenced MySQL), Quintara produced no such files. This is the type of "shifting sands" about which Judge Alsup cautioned.

The Court also threw out Quintara's fraud claim, yet it remains bent on re-litigating those issues. I'll call "bad faith" when I see it.

When is Quintara going to identify which produced files comprise its two remaining trade secrets?

Buchalter

Dylan W. Wiseman
Shareholder
T (415) 227-3506
dwiseman@buchalter.com

55 Second Street, Suite 1700
San Francisco, CA 94105-3493
www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>
Sent: Tuesday, March 23, 2021 3:40 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

	This message has originated from an External Email . lij@lilaw.us < lij@lilaw.us >:
--	--

Dylan,

Please lay off your baseless accusation of bad faith. We are big boys. We know how to properly litigate a trade secret case. Every time there is a minor discovery dispute, you just jump up and scream bad faith. We don't appreciate that. Like I said before, let the case take care of itself and by the end we will find out anybody litigates in bad faith.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>

Sent: Tuesday, March 23, 2021 10:36 AM

To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>

Subject: Quintara vs. Ruifeng

Importance: High

Jim

Quintara's document production establishes it is prosecuting its DTSA claim in bad faith. Pursuant to *Flir Systems, Inc. v. Parrish*, 174 Cal.App.4th 1270, 1281 (2009) courts review the manner in which the plaintiff litigated its claims when assessing the "subjective bad faith" element of awarding a defendant its attorneys' fees,

Quintara was supposed to produce two files which Dan confirmed on March 18, 2021 are SQL database files. The first file is its customer profile database and the second is its vendor database. No SQL files were produced.

Instead, Quintara produced thousands of irrelevant documents, all of which are improperly marked "Confidential-Attorneys' Eyes Only," and have nothing to do with either the customer profile database or the vendor database. I am enclosing samples of the marketing materials, PowerPoint training files, order forms, Tax-payer ID request forms, sequencing guidelines, and promotional material which were dumped on my office yesterday.

Produce the customer profile database and the vendor database by 12:00 p.m. (Pacific) today, or we will have no choice but to raise these discovery abuses with Judge Alsup.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 6

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/23/2021 5:36:27 PM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]
CC: Smith, Amy [asmith@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Bardon, Dana [dbardon@buchalter.com]; Smith, Amy [asmith@buchalter.com]
Subject: Quintara vs. Ruifeng
Attachments: QB009253_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.PDF; QB009254_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.PPTX; QB009218_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.PDF; QB009132_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.JPG; QB009116_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.PDF; QB009103_HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY.PDF
Importance: High

Jim

Quintara's document production establishes it is prosecuting its DTSA claim in bad faith. Pursuant to *Flir Systems, Inc. v. Parrish*, 174 Cal.App.4th 1270, 1281 (2009) courts review the manner in which the plaintiff litigated its claims when assessing the "subjective bad faith" element of awarding a defendant its attorneys' fees,

Quintara was supposed to produce two files which Dan confirmed on March 18, 2021 are SQL database files. The first file is its customer profile database and the second is its vendor database. No SQL files were produced.

Instead, Quintara produced thousands of irrelevant documents, all of which are improperly marked "Confidential-Attorneys' Eyes Only," and have nothing to do with either the customer profile database or the vendor database. I am enclosing samples of the marketing materials, PowerPoint training files, order forms, Tax-payer ID request forms, sequencing guidelines, and promotional material which were dumped on my office yesterday.

Produce the customer profile database and the vendor database by 12:00 p.m. (Pacific) today, or we will have no choice but to raise these discovery abuses with Judge Alsup.

Dylan Wiseman
T (415) 227-3506
C (916) 212-6737

QUINTARA BIOSCIENCES

2012 AWARD

WIN A IPAD3 OR KINDLE FIRE

Quintara Biosciences is a leading DNA sequencing service company providing high quality and customized sample preparation and data analysis for our customers. We appreciate your business with us and we are offering the following award for 2012.



1. Performance Award

The customers (*industry and the academic labs compete separately*) with the most purchase in dollar amount will get a new Apple iPad 3 from us!

2. Loyalty Award

Existing customers (*by researcher's name*) before April 2012 are qualified for the raffle for one Kindle Fire e-reader and one lucky customer will be awarded.

3. New Customer Award

Any new customers (*by researcher's name*) are qualified for the raffle for one Kindle Fire e-reader and one lucky customer will be awarded.



CONTEST RULE AND REGULATION

The contest is for the service purchased between April 1, 2012 and November 30, 2012. The Performance award is only given to the top industry company who has made service purchase over \$10,000 and the top academic lab who have made service purchase of \$5,000. The Loyalty Award and New Customer award are given to the existing customer (customer before April 1, 2012) and new customer (customer after April 1, 2012), respectively, whose names are entered into the contest and win the raffle drawing.

How to Order Quintara DNA Sequencing Service?

Within Bay Area

Step 1

Visit our website at www.quintarabio.com

- Fill-in an Order form (downloaded the order form) with PO number, or
- Create an online account and use the online order entry
- Prepare your template (see sample preparation section)
- Prepare primers (check support to find out complimentary primers)

Step 2

Contact Quintara for sample pick-up

- Make sure the samples are properly sealed, labeled, and in our drop-box
- Email us your order form at info@quintarabio.com or stick it with samples
- Call us at 415-738-2509 for sample pick up before 4 pm

Step 3

Sample pick-up and receiving electronic results

- Your samples are picked up from the drop-box at your site
- Normally get your results before 10 am the next day
- View your results from your email or your online account folder

Quintara Biosciences

636 San Pablo Avenue, Albany, CA 94706

Tel: 1-877-835-4464



Office of the Chief Financial Officer
Accounts Payable Vendor Desk
1 Cyclotron Rd, MS: 90J
Berkeley, CA 94720
(510) 486-6954

REQUEST FOR TAXPAYER IDENTIFICATION NUMBER AND CERTIFICATION

LBNL Substitute W-9

FOR DOMESTIC COMPANIES ONLY

PLEASE TYPE OR PRINT CLEARLY

Instructions to Vendor: Please fill out the form and return/fax to the individual requesting it. An IRS W9 form is not accepted in lieu of this W9 Substitute form.

Instructions to LBNL Department: Please fax to (510) 486-6975 or send via Lab mail to MS: 90J.

Questions: Please email vendordesk@lbl.gov or call (510) 486-6954.

VENDOR INFORMATION			
Business Name (as it appears on federal tax return)		Taxpayer ID No. (Federal TIN used to file Federal tax return)	30-0610752
Quintara Biosciences, Inc.			
DBA name if any (payment will be issued to this name)	Business phone number	Business fax number	
	() 877-835-4464	() 877-835-2534	
Physical / PO Street Address	City	State	Zip Code + 4
636 San Pablo Avenue	Albany	CA	94706-1129
Remittance Address (if different than Physical / PO Address)	City	State	Zip Code + 4
1563 Solano Ave., #268	Berkeley	CA	94707-2116
Dun & Bradstreet Number	NAICS Code(s)	Congressional District	
877986302	541710	District 9	

VENDOR PROFILE AND TAX ACKNOWLEDGEMENT			
What does your business provide? (Check all that apply)			<input checked="" type="checkbox"/> Services <input type="checkbox"/> Supplies
Type of Business (Check one):	<input type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> Government Entity <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Tax Exempt Entity		
Business Classification (Check ONE):			
<input type="checkbox"/> Non-Profit (NP) <input type="checkbox"/> DOE Contractor (DO) <input type="checkbox"/> Large Business (LB) <input checked="" type="checkbox"/> Small Business (SB)			
<input type="checkbox"/> State & Local Gov (SL) <input type="checkbox"/> Educational (Not UC) <input type="checkbox"/> University of California (UC) <input type="checkbox"/> Federal Entity (FE)			
Business Status (please check all that apply)			
<input type="checkbox"/> Disadvantage Business <input type="checkbox"/> Veteran-Owned Small Business <input type="checkbox"/> 8a Set-Aside <input type="checkbox"/> Hub Zone			
<input type="checkbox"/> Women-owned Business <input type="checkbox"/> Disabled Veteran <input type="checkbox"/> California Disabled Veteran			
STATE OF CALIFORNIA INCOME TAX WITHHOLDING REQUIREMENT			
Do you physically perform services in the State of California?			
<input type="checkbox"/> No Please complete Form 587 <input checked="" type="checkbox"/> Yes Please complete Form 590 or 587 as applicable			
Either a CA 587 or CA 590 form (not both) must be completed and signed in order to do business with LBNL.			
The information below is requested under U.S. Tax Laws. Failure to provide this information may prevent you from being able to do business with LBNL, or may result in LBNL having to deduct Federal and State backup withholding.			
Under penalties of perjury, I certify that:			
1. The number shown on this form is my correct taxpayer identification number and 2. I am not subject to backup withholding due to failure to report interest and dividend income, and 3. I am a U.S. citizen, or other U.S. person (Note: You are considered a U.S. person if you are: 1) U.S. Citizen or U.S. resident alien. 2) A partnership, corporation, company, or association created or organized in the U.S., or under the laws of the U.S.).			
The Internal Revenue Service does not require your consent to any provision of this document other than the certification required to avoid backup withholdings.			
Signature of U.S. person and vendor representative (must be authorized to sign an IRS form)			Date
			10/12/11
Name and title of the above individual (please print)			Date
Shan Richard Shan / CEO			10/12/11

3/2/2011

1



Office of the Chief Financial Officer
Accounts Payable Vendor Desk
1 Cyclotron Rd, MS: 90J
Berkeley, CA 94720
(510) 486-6954

DIRECT DEPOSIT ENROLLMENT FORM

Name of Financial Institution Citibank, NA		Name on account Quintara Biosciences, Inc.	
Address 1377 Solano Avenue		City Albany	State CA
		Zip code 94706	
Type of Account <input checked="" type="checkbox"/> Checking <input type="checkbox"/> Savings	Bank Routing Number (RTN) (9 digits) 321171184		
Account Number (Include leading zeros - do NOT include check number): Financial institution routing and account numbers can be identified at the bottom of your checks.		203612882	

DIRECT DEPOSIT AGREEMENT

I authorize the Regents of the University of California, Lawrence Berkeley National Laboratory to deposit by electronic transfer payments owed to me by LBNL and, if necessary, debit entries and adjustments for any amounts deposited electronically in error (will receive written notification beforehand). LBNL shall deposit the payments in the financial institution and account designated above. I recognize that if I fail to provide complete and accurate information on this authorization form, the processing of the form may be delayed or my payments may be erroneously transferred electronically.

This authorization will remain in effect until canceled in writing. I must initiate and complete a new authorization form if I change my account, close my account, or change financial institutions.

Authorized Signature 	Printed Name RICHARD SHAN	Date 10/12/11
Company contact information for notification and details of direct deposit payments		
Contact Name Richard Shan	Phone number 510-847-9257	Email address for payment notification richard.shan@quintarabio.com

LBNL Use Only	
Vendor No.:	
Location No.:	

YEAR **2011** **Withholding Exemption Certificate** CALIFORNIA FORM **590**
 (This form can only be used to certify exemption from nonresident withholding under California Revenue and Taxation Code (R&TC) Section 18662. Do not use this form for exemption from wage withholding.)

File this form with your withholding agent. (Please type or print)

Withholding agent's name

UC - LAWRENCE BERKELEY NATIONAL LABORATORY

Payee's name

Quintara Biosciences, Inc.

 Payee's ☐ SOS file no. ☐ SSN or ITIN ☒ CA corp. no. ☒ FEIN
 30-0610752
Address (number and street, PO Box, or PMB no.)
636 San Pablo Avenue

Apt. no./Ste. no.

City
AlbanyState ZIP Code
CA 94706

Read the following carefully and check the box that applies to the payee.

I certify that for the reasons checked below, the payee named on this form is exempt from the California income tax withholding requirement on payment(s) made to the entity or individual.

☐ **Individuals — Certification of Residency:**

I am a resident of California and I reside at the address shown above. If I become a nonresident at any time, I will promptly notify the withholding agent. See instructions for General Information D, Who is a Resident, for the definition of a resident.

☒ **Corporations:**

The above-named corporation has a permanent place of business in California at the address shown above or is qualified through the California Secretary of State (SOS) to do business in California. The corporation will file a California tax return and withhold on payments of California source income to nonresidents when required. If this corporation ceases to have a permanent place of business in California or ceases to do any of the above, I will promptly notify the withholding agent. See instructions for General Information F, What is a Permanent Place of Business, for the definition of permanent place of business.

☐ **Partnerships or limited liability companies (LLC):**

The above-named partnership or LLC has a permanent place of business in California at the address shown above or is registered with the California SOS, and is subject to the laws of California. The partnership or LLC will file a California tax return and will withhold on foreign and domestic nonresident partners or members when required. If the partnership or LLC ceases to do any of the above, I will promptly inform the withholding agent. For withholding purposes, a limited liability partnership (LLP) is treated like any other partnership.

☐ **Tax-Exempt Entities:**

The above-named entity is exempt from tax under California Revenue and Taxation Code (R&TC) Section 23701 (insert letter) or Internal Revenue Code Section 501(c) (insert number). The tax-exempt entity will withhold on payments of California source income to nonresidents when required. If this entity ceases to be exempt from tax, I will promptly notify the withholding agent. Individuals cannot be tax-exempt entities.

☐ **Insurance Companies, Individual Retirement Arrangements (IRAs), or Qualified Pension/Profit Sharing Plans:**

The above-named entity is an insurance company, IRA, or a federally qualified pension or profit-sharing plan.

☐ **California Trusts:**

At least one trustee and one noncontingent beneficiary of the above-named trust is a California resident. The trust will file a California fiduciary tax return and will withhold on foreign and domestic nonresident beneficiaries when required. If the trustee becomes a nonresident at any time, I will promptly notify the withholding agent.

☐ **Estates — Certification of Residency of Deceased Person:**

I am the executor of the above-named person's estate. The decedent was a California resident at the time of death. The estate will file a California fiduciary tax return and will withhold on foreign and domestic nonresident beneficiaries when required.

☐ **Nonmilitary Spouse of a Military Servicemember:**

I am a nonmilitary spouse of a military servicemember and I meet the Military Spouse Residency Relief Act (MSRRA) requirements. See instructions for General Information E, MSRRA.

CERTIFICATE: Please complete and sign below.

Under penalties of perjury, I hereby certify that the information provided in this document is, to the best of my knowledge, true and correct. If conditions change, I will promptly notify the withholding agent.

Payee's name and title (type or print) Xueling Zhao, CFO Daytime telephone no. 510-847-9256Payee's signature [Signature] Date 10-12-11

For Privacy Notice, get form FTB 1131.

7061113

Form 590 c2 2010

Order@genewayresearch.com Fax: 510-266-0588

DNA Sequencing Order Form

Iowa City, IA 52242

Billing Address:

University of Iowa

Iowa City, IA 52242

No	Sample ID <i>(Your initials + number)</i>	Sample Name Copy as Your Record	DNA Type	Size (bp)	Concentration/Vol (μ l) (ng/ μ l)	GC Rich? Yes / No	Primer or Notes (misc.)
			Plasmid	PCR			
1	HM01	HM01-4hr	X		~4000	10	150
2	HM02	HM02-4hr	X		~4000	10	83
3	HM03	HM03-4hr	X		~4000	10	98.6
4	HM04	HM04-4hr	X		~4000	10	1628
5	HM05	HM05-4hr	X		~4000	10	118.3
6	HM06	HM06-24hr	X		~4000	10	138.7
7	HM07	HM07-24hr	X		~4000	10	76.2
8	HM08	HM08-24hr	X		~4000	10	127.9
9	HM09	HM09-24hr	X		~4000	10	74.4
10	HM10	HM10-24hr	X		~4000	10	159
11	HM11	HM11-120hr	X		~4000	10	75.4
12	HM12	HM12-120hr	X		~4000	10	84.2
13	HM13	HM13-120hr	X		~4000	10	58.6
14	HM14	HM14-120hr	X		~4000	10	95.5
15	HM15	HM15-120hr	X		~4000	10	49.5
16							
17							
18							

QUINTARA BIOSCIENCES DNA SEQUENCING GUIDELINE

Sample Preparation Guidelines

Type	Mixed?	Preparation
Plasmid	Premixed	800ng plasmid DNA (1200ng for large plasmid (>10kb))+12pmol primer, add dH2O to 15•L;
Plasmid	unmixed	800ng plasmid DNA (1200ng for large plasmid (>10kb)), add dH2O to 12•L;
PCR	Premixed	20-50ng/1000bp purified PCR product + 12pmol primer. add dH2O to 15•L;
PCR	unmixed	20-50ng/1000bp PCR product, add dH2O to 12•L;

Sample Volume

The general rule is to send us 12-15uL plasmid at the best concentration you can get, and send your primer at 3uM with a minimum of 10ul. All leftover samples and primer will be stored for two weeks. We can also store your primers on-site for longer periods of time if requested. These stocked primers should be submitted at a concentration of 100uM, with sequence information for re-stock.

Tubes and labeling

Please use 8-well PCR strip tubes for samples and 1.5mL Eppendorf tubes for primers.

Please label the first and last of each PCR strip tubes with your initials and sample numbers. For example, the tubes should be labeled as (JS01 and JS08 on the first strip, JS09 and JS12 on the second strip if John Smith has 12 DNA sequencing samples.

Please label on top of the primer tubes with primer names and primer concentrations.

Sign up and Place DNA Sequencing Order

Register an account

You can go to www.quintarabio.com, click on "login" on the upper right corner of the homepage. (The direct link: www.quintarabio.com/login). Existing users can login here. New users should click "register" link, and fill out the user profile page (The direct link: <http://www.quintarabio.com/user/register>). If you do not know the PO number, you can temporarily leave that field blank.

Once you login, you can use our online ordering system (choose links from the left hand panel). Print out the sample form and submit it with the physical samples. You do not need to schedule a pickup with us, placing the online order will secure your sample pickup.

Naming convention for samples

Please use your initials and sample number (for example, JS01 and JS02). Primer names can stay as is (for example, vF and vR). The resulting sequencing files will be named JS01_vF, JS01_vR, JS02_vF, and JS02_vR.

Sample pick-up locations, cut-off time, and data delivery

Pickup On	Delivery By
Weekdays 10:30 AM	Same day 8 PM
Weekdays 4:30 PM	Next day 10 AM
Weekdays 7:30 PM	Next day 10 AM
Weekends 5 PM	Next day Noon

We will pick up the order directly from your lab during weekdays for the morning pick-up (10:30 AM) and the afternoon pick-up (4:30 PM).

Due to limited access of Li Ka Shing building, we have a sample drop off box in 183 Li Ka Shing (first floor freezer farm, on the bottom shelf of a small fridge where the top shelf is used by the Berkeley campus DNA sequencing facility). We do the 10:30 AM pickup from this drop off box. For the late afternoon or evening samples, please either make appointment with us or drop off the samples at EBB drop off box.

We will pick up the samples from drop-off box or folder outside the building, or by appointment.

Building	Drop-off box/folder
Stanley Hall	Drop-off folder is on the wall of Stanley Hall loading dock.
Energy Bioscience Building (2151 Berkeley Way)	Drop-off box mounted on the rails down by the loading dock.

Sequence data format

You will receive two files for each sequencing reaction. There will be one .seq file that is a text file containing the basecalls. The other file will be an .ab1 file that contains the chromatogram and quality rating determined by the ABI basecaller (currently KB version 1.4).

Phred file (.phd.1) file is a text file containing each basecall and its quality value. This file format is for machine analysis. The Phred files are not automatically included, but are available upon request.

Data Delivery

Most of the sequencing data would be available earlier in the morning (before 8 AM). You can access these data by logging into your account. We do manual data QC on these sequencing data, and you should receive a notification email by 10AM on most of the days.

The QC notification email contains the following information:

Our general evaluation of the sequencing reactions (Good, OK, Not Good, All failed).

Our analysis on the sequencing reactions.

Our follow up actions (rerun, repeat).

Sequencing Primers

Universal Sequencing Primers: These 6 primers are from fresh stock every day.

QB Number	Primer Name	Primer Sequence
QB0008	BGH - Rev	TAGAAGGCACAGTCGAGG
QB0012	CMV - For	CGCAAATGGGCGGTAGGCGTG
QB0046	M13 (-21) F	TGTAAAACGACGGCCAGT
QB0048	M13Rev	CAGGAAACAGCTATGAC
QB0106	T7F	TAATACGACTCACTATAGGG
QB0107	T7R	GCTAGTTATTGCTCAGCGG

We have more than 5000 other sequencing primers, and we have an online program to help you to find which primers to use (<http://www.quintarabio.com/qbtools/findPrimer>). Some of the primers are from us while other primers are from our customers, you can use these primers free of charge. They should cover most of the commercial cloning vectors. Please let us know if you do not want to share your primers.

Get a

\$20 amazon

Gift Certificate

for trying out...

Quintara Sequencing

Why Quintara Sequencing?

- ✓ **\$2 per sample***
- ✓ **Free Colony PCR***
(we pick and sequence for you)
- ✓ Fast return time (Data out by 10am next day)
- ✓ After hours and Weekend pickup from your lab
- ✓ We can store your primers in house (less hassle)
- ✓ Huge (4000+) in house sequencing primer library

Email info@quintarabio.com and mention "**Berkeley Promotion**"
or
call us at **1-877-835-4464**

* Limited time offer to UC Berkeley campus customers only. Ends Dec. 31, 2012.
Gift Certificate delivered after minimum of 5 reaction orders with valid P.O. number.

EXHIBIT 7

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/24/2021 4:14:44 AM
To: Daniel Peterson [petersond@lilaw.us]; lij@lilaw.us
CC: Smith, Amy [asmith@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Bardon, Dana [dbardon@buchalter.com]; Smith, Amy [asmith@buchalter.com]
Subject: RE: Quintara vs. Ruifeng

Dan

By “includes” this confirms that the below Bates numbers are the only responsive records.

Also, please produce tomorrow by Noon all email messages with the attachments for:

Name

Type



2021-03-19_customers_from_Alan-email

File folder

If that doesn’t occur, we will conclude that Quintara has abandoned all claims that any misappropriation occurred relative to those records.

It is unbelievable that for deposition notices, which were served originally on November 24, 2020, that two days before a scheduled deposition Quintara still cannot determine what are its alleged trade secrets. As Judge Alsup wrote in *Swarmify, Inc. v. Cloudfare, Inc.*, No. C 17-06957 WHA, 2018 U.S. Dist. LEXIS 91333, *8 (N.D. Cal. May 31, 2018).

Gamesmanship, even if well-disguised at the outset, tends to come into clearer focus as litigation progresses. For example, it becomes easier to pinpoint how vaguely-alleged trade secrets may have functioned as moving targets, and how the plaintiff may have taken advantage of the shifting sands of litigation to evade counterarguments. These developments may cast the unreasonableness of the initial disclosure into sharp relief in light of how the alleged trade secrets evolved over time. In such cases, a plaintiff that merely postpones reckoning with *Section 2019.210* early on may eventually find that the consequences of their evasions come home to roost in the form of an adverse ruling on the entire trade secret misappropriation claim. See, e.g., *Waymo, 2017 U.S. Dist. LEXIS 182197, 2017 WL 5000352, at *7-9*. As the February 27 order foreshadowed, Swarmify has already gone quite a ways down this path.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: Daniel Peterson <petersond@lilaw.us>

Sent: Tuesday, March 23, 2021 6:17 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; lij@lilaw.us

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>

Subject: RE: Quintara vs. Ruifeng

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Please find an Identification of bates numbers for files which comprise the trade secret databases:

Customer Profile Database includes the following bates ranges:

QB007849-8027

8078-8254

8271-8780

8811-8818

8820-8823

8833-8838

8841-8853

8865-8866

8871

8873

8876

9027-9051

9068-9069

9110

Vendor Database includes the following bates ranges:

QB008255-8257

8862-8864

9246

9248

9255-9382

9385-9388

9391-9425

9522-9559

I should be able to produce the emails before the end of the week.
I will let you know when our discovery vendor gives us a more precise time for production.
I will note here, the excel sheets which you say are corrupted were also included in bates range 7849 – 8027

Thank you,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Tuesday, March 23, 2021 2:55 PM
To: Daniel Peterson <petersond@lilaw.us>; lij@lilaw.us
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

When can we expect receipt of the emails with attachments and the identification of Bates numbers or folders which comprise the customer profile database and the vendor database?

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700
San Francisco, CA 94105-3493
www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Daniel Peterson <petersond@lilaw.us>
Sent: Tuesday, March 23, 2021 2:40 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; lij@lilaw.us
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

I have just re-downloaded the production folder and accessed the files without issue, I'm not sure why you're having trouble but I'm not seeing any corruption.
I am also not having any trouble opening the Excel files contained in the folder before it was zipped.

However, Plaintiff will produce the emails with attachments.



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Wiseman, Dylan W. <dwiseman@buchalter.com>


Sent: Tuesday, March 23, 2021 1:35 PM

To: Daniel Peterson <petersond@lilaw.us>; lij@lilaw.us

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>

Subject: RE: Quintara vs. Ruifeng

Also, all of the Excel files are corrupt in the folder entitled:

Name	Type
 2021-03-19_customers_from_Alan-email	File folder

If any records in this folder support Quintara's claim for misappropriation, please immediately produce the emails with the attachments.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700
San Francisco, CA 94105-3493
www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Wiseman, Dylan W.

Sent: Tuesday, March 23, 2021 12:16 PM

To: 'Daniel Peterson' <petersond@lilaw.us>; lij@lilaw.us

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>

Subject: RE: Quintara vs. Ruifeng

Dan

Please immediately identify by Bates number or by folder which records "comprise" the customer profile database and which are the vendor database.

You had originally offered to produce all of the alleged trade secrets on or about February 25, 2021, nearly a month ago. Now that we're dealing with just two databases, our request to identify the Bates numbers or folders is quite reasonable.

We're asking that Quintara re-designate this production. Perceived haste does not justify the over designation under a protective order.

From: Daniel Peterson <petersond@lilaw.us>
Sent: Tuesday, March 23, 2021 12:02 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; lij@lilaw.us
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: RE: Quintara vs. Ruifeng

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Dylan,

Quintara has produced the documents which comprise the customer profile and vendor databases. To clarify, on March 18, 2021, I did not confirm that there were two files which were SQL database files. On March 18, I said the following on the issue: "Information contained in the databases can be reviewed with out specialized software, however, SQL/ MySQL are used to operate the databases." I am not an expert on computer databases or the MySQL software, however, it is my understanding that MySQL is software used to add, access, and process data stored in a computer database, it is not the database itself.

Regarding the marking of documents. You had requested an immediate production of the databases after initially opposing our plans to produce Plaintiffs trade secrets.

I worked quickly to make this production of the files comprising the databases, which left me with no time to mark/designate less sensitive files contained in the trade secret databases.

The less sensitive files comprising the databases can be re-designated.



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Tuesday, March 23, 2021 10:36 AM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>
Subject: Quintara vs. Ruifeng
Importance: High

Jim

Quintara's document production establishes it is prosecuting its DTSA claim in bad faith. Pursuant to *Flir Systems, Inc. v. Parrish*, 174 Cal.App.4th 1270, 1281 (2009) courts review the manner in which the plaintiff

litigated its claims when assessing the “subjective bad faith” element of awarding a defendant its attorneys’ fees,

Quintara was supposed to produce two files which Dan confirmed on March 18, 2021 are SQL database files. The first file is its customer profile database and the second is its vendor database. **No SQL files were produced.**

Instead, Quintara produced thousands of irrelevant documents, all of which are improperly marked “Confidential-Attorneys’ Eyes Only,” and have nothing to do with either the customer profile database or the vendor database. I am enclosing samples of the marketing materials, PowerPoint training files, order forms, Tax-payer ID request forms, sequencing guidelines, and promotional material which were dumped on my office yesterday.

Produce the **customer profile database and the vendor database by 12:00 p.m. (Pacific) today**, or we will have no choice but to raise these discovery abuses with Judge Alsup.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 8

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/31/2021 5:25:55 PM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]
CC: Smith, Amy [asmith@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Bardon, Dana [dbardon@buchalter.com]; Smith, Amy [asmith@buchalter.com]; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]
Subject: RE: Computer Forensic Inspections

Also, this confirms that both sides' discovery will be limited to the scope of the March 13, 2021 order.

1 All state-law claims and counterclaims are **STAYED**. The parties shall proceed through
 2 discovery on the trade-secret misappropriation claim. Given the narrowing of the present
 3 dispute, the current case management schedule (Dkt. No. 29) should do. To reproduce the
 4 most relevant dates here, fast discovery closes and opening expert reports are due **MAY 14**.
 5 Dispositive motions are due by **JULY 1**. The March 18 hearing is **VACATED**. The parties shall
 6 please re-notice their remaining, relevant disputes.
 7 **IT IS SO ORDERED.**

If the Court retains jurisdiction, then we expect that both sides will permit additional discovery on the remaining claims and counter-claims. Please confirm that is your understanding.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Tuesday, March 30, 2021 4:20 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

No, we are not dismissing him. The estimate is no longer than 7 hours. That's the best I can do at this point.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San José, CA
 650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Tuesday, March 30, 2021 4:16 PM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

Jim

Also, I spoke with Ray Shao today. For both companies, he never interacted with customers or vendors, and never had access to that type of information. We can provide a declaration to that effect. I strongly encourage Quintara to dismiss him, even if it is without prejudice.

If you are unwilling to dismiss him, please identify your best estimate for the duration of his deposition. It seems this one should be very short, particularly given the scope of discovery after the March 13, 2021 order. Thank you,

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Wiseman, Dylan W.
Sent: Tuesday, March 30, 2021 3:59 PM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

Jim

Please don't mischaracterize the Court's comments. On March 24, 2021, Judge Alsup didn't rule on any issues regarding computer forensics. After addressing the parties' dispute, at Dan's invitation he commented on what "typically" or "usually" happens in trade secret disputes. That was the extent of Judge Alsup's commentary. He certainly did not conclude Quintara is "entitled to inspect the computers to find out about the trade secrets." Please do not attempt to create a false record. We have ordered the transcript, and your assertion is provably false.

Our position is that, after losing nine of its 11 claimed trade secrets, Quintara has finally produced the files it claims are its "trade secrets." Those files consist of its Customer Profile and Vendor Databases.

The first step is to determine the presence or absence of those specific files on Ruifeng's devices. Your office hasn't yet taken the first step by serving an inspection demands for the files, yet it improperly seeks to delve into the computers of its former business partner. See *Bethea v. Comcast*, 2018 F.R.D. 328, 329-220 (D.D.C 2003) ("In the context of computer systems and computer records, inspection or seizure is not permitted unless the moving party can demonstrate that the documents they seek to compel do, in fact, exist and are being unlawfully withheld."); *Henderson v. United States Bank, N.A.*, Case No. 08C08399, 2009 U.S. Dist. LEXIS 40948, at *1 (E.D. Wis. Apr. 29, 2009) (summarizing cases); see also *Barten v. State Farm Mut. Auto. Ins. Co.*, Case No. CIV-12-399-TUC-CKJ(LAB), 2013 U.S. Dist. LEXIS 191095; *Tumbling v. Merced Irrigation Dist.*, Case No. 1:08cv1801 LJO DLB, 2009 U.S. Dist. LEXIS 63941, at *1 (Denying computer forensics "Defendants admitted, however, that it had not yet exhausted less intrusive and/or burdensome means of discovering the information."). **Weeks ago, Brandon provided Dan with this legal authority. We received no response.**

It is telling that Quintara refuses to take the initial step of serving inspection demands to determine whether its Customer Profile and Vendor Database files are present on Ruifeng's computers. It appears Quintara fears the outcome of that lesser intrusive discovery. The summary adjudication deadline is approaching, and we strongly encourage Quintara to take action and not sit on its hands as it has done for weeks.

If the exist on Ruifeng's computers, serving inspection demands should identify the specific files which comprise Quintara's claimed trade secrets. As Judge Alsup ruled on March 13, 2020, Quintara's "trade secret" files will be distinguishable because they originated from Quintara:

These are minimal descriptions, to be sure, but adequate given the subject matter. The wisdom gained from years of interactions with customers and vendors may be trade secret. *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1521-22 (1997). As plaintiff explains, it used the customer profile to respond to customer feedback and tailor product proposals. So too the vendor database allowed plaintiff to tailor its purchases and negotiate favorable terms based on past dealing. Moreover, this order emphasizes that these profile databases are distinct among the other categories of asserted secrets here because the underlying transactions are inherently party-specific. That is, we will be able to distinguish between plaintiff's transaction data and defendants' transaction data, or indeed public transaction data, in discovery and summary judgment, because the underlying communications, invoices, and receipts will identify plaintiff, rather than another. For these types of secrets, plaintiff adequately discloses the information type, its background, and its value. And, the distinctiveness of the underlying data itself should prevent plaintiff from improperly claiming whatever it happens to find in discovery into defendants' files.

Furthermore, Quintara's RFP Nos. 17-19 are hopelessly overbroad, and would encompass "all computers," and not just those which Quintara alleged formed the basis of its DTSA claim. Quintara's First Amended Complaint provides:

The Misappropriation of Trade Secrets**Through Conversion and Breach of Confidentiality Agreement**

67. Over the years, Quintara developed many valuable business and technology trade secrets, many of which have been misappropriated by Defendants through conversion of Quintara's equipment containing the trade secrets.

68. Defendants have converted a total of 10 desktop computers and one server computer of Quintara. Defendants had ready access to the contents of computers immediately upon the conversion on March 9, 2020, because co-defendants A. Wong, Li, and Shao were granted access to the contents of the computers pursuant to their employment status with Quintara.

69. Defendants have the following Quintara's trade secrets contained in the computers which they have converted and are currently using:

- a. Quintara's customer database including names, addresses, and contact information of

Yet, Quintara's RFP Nos 17-19 provide:

REQUEST FOR PRODUCTION NO. 17:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which were located at 3563 Investment Boulevard, Suite 2, Hayward, California on March 9, 2020.

REQUEST FOR PRODUCTION NO. 18:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which are located at 3563 Investment Boulevard, Suite 2, Hayward, California.

REQUEST FOR PRODUCTION NO. 19:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which Defendant claims to own, in part of in full, pursuant to an alleged Cooperation Agreement which, according to Defendant, makes it the 51% owner of a joint venture.

Given that its TRO failed, Quintara seeks to continue to harass its former business partner with discovery which is highly burdensome and intrusive without even attempting to serve inspection demands. Again, it is this type of heavy-handed, baseless tactic which underscores that Quintara is prosecuting its trade secret claim in bad faith under the DTSA. *Swarmify, Inc. v. Cloudfare, Inc.*, Case No. C-17-06957, 2018 U.S. Dist. 168317, *6. (N.D. Cal. Sept. 28, 2018).

Please review the authority we have cited, serve inspection demands, and then after we have responded and determined if the specific files are even present on Ruifeng's computers, we will then consider entering into an arrangement with a mutually agreed upon forensic neutral to review those computers which contain any such files.

We see no need to conduct a telephonic meet and confer as this dispute is hardly ripe for Quintara to bring a motion before Judge Alsup.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>

Sent: Tuesday, March 30, 2021 1:30 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: Computer Forensic Inspections

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

Dan asks me to address this issue with you. I understand that, despite what the judge said during the hearing that we are entitled to inspect the computers to find out about the trade secrets, you are still resisting the inspections.

By this email, I ask you to answer the following questions by EOB today:

1. Because these were Quintara's computers until recently, what is the basis for you to say there are any privacy or privileged matters of your clients on these computers if the same argument cannot be flipped to say there are also privacy and privileged matters on these computers that belonged to our client?
2. How have Defendants used these computers to justify their claim of any privacy or privilege matter?

Assuming you can justify the existence of privacy or privilege matters on these computers, I have used a computer inspection protocol since 2005 that can deal with any privacy or privileged matters. The protocol involves the following steps:

1. The parties mutually hire a third party forensic inspector by sharing the cost of inspection
2. The inspector will be provided with a list of keywords mutually agreed by the parties and will serve the forensic images with the keywords.
3. The inspector will provide the parties with a list of all hits and Defendants will determine whether they can withhold any of the hits based on privilege by providing a privilege log.
4. The inspector then produce the hit documents minus the privileged documents on the log.

If you don't want to share the cost, we will pay for the inspection, but you will have no say as to what keywords we use and other protocol related issues although you still will be provided with a list of hits to generate your privilege log before the actual documents are provided to us.

So I want to have a meet and confer with you tomorrow on this matter so that we can move the court if necessary. Let me know what time will be good for you.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.521.5956. www.lilaw.us.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 9

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 3/31/2021 12:46:13 AM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]
CC: Smith, Amy [asmith@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Bardon, Dana [dbardon@buchalter.com]; Smith, Amy [asmith@buchalter.com]; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]
Subject: RE: Computer Forensic Inspections

Also, given my Jewish heritage, I find your comparison to Goebbels to be absolutely repugnant. You should be ashamed.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: Wiseman, Dylan W.
Sent: Tuesday, March 30, 2021 4:55 PM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

For a complete record, please be certain to include my message from today at 4:51 as an exhibit to your letter. Thank you,

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Wiseman, Dylan W.
Sent: Tuesday, March 30, 2021 4:51 PM
To: 'lij@lilaw.us' <lij@lilaw.us>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

Jim

Not a surprise. You completely ignored the authority we cited, want to storm forward, and resort to pejoratives. Yet, you fault us for calling attention to these bad faith tactics.

You tried to create a patently false record about Judge Alsup's March 24, 2021 commentary, and then attempt to delve into highly intrusive, burdensome discovery. I'll call bad faith when I see it. When we prevail, I will have an exhaustive record to support our fees motion.

Again, **taking great liberties with the facts**, you now claim "We have propounded the inspection requests a long time ago." That too is provably false. Quintara's RFP (Set Two) which contain Nos. 17-19 was served on **March 15, 2021**. We responded to these facially invalid inspection demands on **March 18, 2021**, and immediately met and conferred. We are not "playing games," and your perceived delay is entirely attributable to Dan's failure to address cases we cited. Please take some time to review the cited authority before burdening Judge Alsup yet again.

There is a bona fide dispute over who owns what. If your clients are so confident that these specific files consisting of their Customer Profile and Vendor Database are on the computers at Ruifeng, why can't you just serve inspection demands for these specific files? What harm will they suffer if the lesser intrusive method is utilized first in compliance with established precedent? Is there goal simply to interfere with Ruifeng's operations? We have agreed to respond to discovery on 15 days, so I'm at a loss to understand their position.

I can't stop you from charging ahead, but you're only giving Judge Alsup more reason to jettison this nasty business divorce which is masquerading as a "trade secrets" dispute to invoke federal question jurisdiction.

From: lij@lilaw.us <lij@lilaw.us>
Sent: Tuesday, March 30, 2021 4:18 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Computer Forensic Inspections

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

These computers were our clients' computers and they said the trade secrets exist in those computers, which can be a declaration to support our motion. You are denying their existence. So why are we not justified to inspect the computers? We have propounded the inspection requests a long time ago. Why are we still playing these games here?

BTW, I understand how you feel about our case. That does not mean you have to end or start every email by accusing us of bad faith. We get your point and we understand you want to keep talking about this point. But we don't subscribe to Dr. Goebbels' theory of propaganda and we don't think by repeating something every chance you have proves the truth of the matter asserted. We are talking about a specific discovery matter here. Let's not get overly philosophical here, please.

If you refuse to meet and confer, we will have no choice but to bring our letter to the court tomorrow without meet and confer.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>

Sent: Tuesday, March 30, 2021 3:59 PM

To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: RE: Computer Forensic Inspections

Jim

Please don't mischaracterize the Court's comments. On March 24, 2021, Judge Alsup didn't rule on any issues regarding computer forensics. After addressing the parties' dispute, at Dan's invitation he commented on what "typically" or "usually" happens in trade secret disputes. That was the extent of Judge Alsup's commentary. He certainly did not conclude Quintara is "entitled to inspect the computers to find out about the trade secrets." Please do not attempt to create a false record. We have ordered the transcript, and your assertion is provably false.

Our position is that, after losing nine of its 11 claimed trade secrets, Quintara has finally produced the files it claims are its "trade secrets." Those files consist of its Customer Profile and Vendor Databases.

The first step is to determine the presence or absence of those specific files on Ruifeng's devices. Your office hasn't yet taken the first step by serving an inspection demands for the files, yet it improperly seeks to delve into the computers of its former business partner. See *Bethea v. Comcast*, 2018 F.R.D. 328, 329-220 (D.D.C 2003) ("In the context of computer systems and computer records, inspection or seizure is not permitted unless the moving party can demonstrate that the documents they seek to compel do, in fact, exist and are being unlawfully withheld."); *Henderson v. United States Bank, N.A.*, Case No. 08C08399, 2009 U.S. Dist. LEXIS 40948, at *1 (E.D. Wis. Apr. 29, 2009) (summarizing cases); see also *Barten v. State Farm Mut. Auto. Ins. Co.*, Case No. CIV-12-399-TUC-CKJ(LAB), 2013 U.S. Dist. LEXIS 191095; *Tumbling v. Merced Irrigation Dist.*, Case No. 1:08cv1801 LJO DLB, 2009 U.S. Dist. LEXIS 63941, at *1 (Denying computer forensics "Defendants admitted, however, that it had not yet exhausted less intrusive and/or burdensome means of discovering the information."). **Weeks ago, Brandon provided Dan with this legal authority. We received no response.**

It is telling that Quintara refuses to take the initial step of serving inspection demands to determine whether its Customer Profile and Vendor Database files are present on Ruifeng's computers. It appears Quintara fears the outcome of that lesser intrusive discovery. The summary adjudication deadline is approaching, and we strongly encourage Quintara to take action and not sit on its hands as it has done for weeks.

If the exist on Ruifeng's computers, serving inspection demands should identify the specific files which comprise Quintara's claimed trade secrets. As Judge Alsup ruled on March 13, 2020, Quintara's "trade secret" files will be distinguishable because they originated from Quintara:

1 These are minimal descriptions, to be sure, but adequate given the subject matter. The
 2 wisdom gained from years of interactions with customers and vendors may be trade secret.
 3 *Morlife, Inc. v. Perry*, 56 Cal. App. 4th 1514, 1521–22 (1997). As plaintiff explains, it used
 4 the customer profile to respond to customer feedback and tailor product proposals. So too the
 5 vendor database allowed plaintiff to tailor its purchases and negotiate favorable terms based on
 6 past dealing. Moreover, this order emphasizes that these profile databases are distinct among
 7 the other categories of asserted secrets here because the underlying transactions are inherently
 8 party-specific. That is, we will be able to distinguish between plaintiff's transaction data and
 9 defendants' transaction data, or indeed public transaction data, in discovery and summary
 10 judgment, because the underlying communications, invoices, and receipts will identify
 11 plaintiff, rather than another. For these types of secrets, plaintiff adequately discloses the
 12 information type, its background, and its value. And, the distinctiveness of the underlying data
 13 itself should prevent plaintiff from improperly claiming whatever it happens to find in
 14 discovery into defendants' files.

Furthermore, Quintara's RFP Nos. 17-19 are hopelessly overbroad, and would encompass "all computers," and not just those which Quintara alleged formed the basis of its DTSA claim. Quintara's First Amended Complaint provides:

The Misappropriation of Trade Secrets

Through Conversion and Breach of Confidentiality Agreement

17
 18
 19 67. Over the years, Quintara developed many valuable business and technology trade
 20 secrets, many of which have been misappropriated by Defendants through conversion of Quintara's
 21 equipment containing the trade secrets.

22 68. Defendants have converted a total of 10 desktop computers and one server computer
 23 of Quintara. Defendants had ready access to the contents of computers immediately upon the
 24 conversion on March 9, 2020, because co-defendants A. Wong, Li, and Shao were granted access to
 25 the contents of the computers pursuant to their employment status with Quintara.

26 69. Defendants have the following Quintara's trade secrets contained in the computers
 27 which they have converted and are currently using:

- a. Quintara's customer database including names, addresses, and contact information of

Yet, Quintara's RFP Nos 17-19 provide:

REQUEST FOR PRODUCTION NO. 17:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which were located at 3563 Investment Boulevard, Suite 2, Hayward, California on March 9, 2020.

REQUEST FOR PRODUCTION NO. 18:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which are located at 3563 Investment Boulevard, Suite 2, Hayward, California.

REQUEST FOR PRODUCTION NO. 19:

Plaintiff requests that Defendant make available for forensic computer inspection, all computers which Defendant claims to own, in part or in full, pursuant to an alleged Cooperation Agreement which, according to Defendant, makes it the 51% owner of a joint venture.

Given that its TRO failed, Quintara seeks to continue to harass its former business partner with discovery which is highly burdensome and intrusive without even attempting to serve inspection demands. Again, it is this type of heavy-handed, baseless tactic which underscores that Quintara is prosecuting its trade secret claim in bad faith under the DTSA. *Swarmify, Inc. v. Cloudflare, Inc.*, Case No. C-17-06957, 2018 U.S. Dist. 168317, *6. (N.D. Cal. Sept. 28, 2018).

Please review the authority we have cited, serve inspection demands, and then after we have responded and determined if the specific files are even present on Ruifeng's computers, we will then consider entering into an arrangement with a mutually agreed upon forensic neutral to review those computers which contain any such files.

We see no need to conduct a telephonic meet and confer as this dispute is hardly ripe for Quintara to bring a motion before Judge Alsup.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>

Sent: Tuesday, March 30, 2021 1:30 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>

Cc: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Bardon, Dana <dbardon@buchalter.com>; Smith, Amy <asmith@buchalter.com>;

chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: Computer Forensic Inspections

This message has originated from an External Email. lij@lilaw.us <lij@lilaw.us>:

Dylan,

Dan asks me to address this issue with you. I understand that, despite what the judge said during the hearing that we are entitled to inspect the computers to find out about the trade secrets, you are still resisting the inspections.

By this email, I ask you to answer the following questions by EOB today:

1. Because these were Quintara's computers until recently, what is the basis for you to say there are any privacy or privileged matters of your clients on these computers if the same argument cannot be flipped to say there are also privacy and privileged matters on these computers that belonged to our client?
2. How have Defendants used these computers to justify their claim of any privacy or privilege matter?

Assuming you can justify the existence of privacy or privilege matters on these computers, I have used a computer inspection protocol since 2005 that can deal with any privacy or privileged matters. The protocol involves the following steps:

1. The parties mutually hire a third party forensic inspector by sharing the cost of inspection
2. The inspector will be provided with a list of keywords mutually agreed by the parties and will serve the forensic images with the keywords.
3. The inspector will provide the parties with a list of all hits and Defendants will determine whether they can withhold any of the hits based on privilege by providing a privilege log.
4. The inspector then produce the hit documents minus the privileged documents on the log.

If you don't want to share the cost, we will pay for the inspection, but you will have no say as to what keywords we use and other protocol related issues although you still will be provided with a list of hits to generate your privilege log before the actual documents are provided to us.

So I want to have a meet and confer with you tomorrow on this matter so that we can move the court if necessary. Let me know what time will be good for you.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 10

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 4/23/2021 10:48:52 PM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]
CC: Ng, Tiffany F. [tng@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Smith, Amy [asmith@buchalter.com]
Subject: Ruifeng; Quintara vs.
Attachments: Order re Discovery Disputes.pdf; Quintara v. Ruifeng et al.: Quintara letter re computers; Buch5267_Computerlist.xlsx
Importance: High

Jim and Dan

On April 16, 2021, the Court ordered the following:

“[B]y April 21, 2021, must provide defendants with a detailed description of what to search for on the computers. The more specifics plaintiff can provide, the better. Defendants, by April 23, 2021, must search all eleven computers, looking for the information that plaintiff has identified. Defendants must provide plaintiff with the results of the search, also by April 23.”

As we represented to the Court on April 16, 2021, we received a list of files which Quintara identified as the customer profile database and vendor database. This list was sent by Mr. Peterson on March 23, 2021, and included the bates numbers of 922 files. I have attached that email for your review.

As we had discussed with Magistrate Judge Tse, with Quintara’s March 23, 2021 list, we hired a third party computer forensics vendor to conduct a search on all computers/servers located at 3563 Investment Blvd., Suite 2 in Hayward, California. There are actually a total of 16 computers/servers on site. Even though Quintara claims to own 11 of the computers, it was unable to identify them with any specificity. Nevertheless, to ensure compliance with the April 16, 2021 Order, a search has been performed on all computers for the 922 files.

Out of the 922 files, we located **one file**—Test.txt (QB007896)—on multiple devices.

Computer Name	Hit word	Path
Tennessee	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Bengal	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Oregon	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Vera	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Roxanne	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Hawaii	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt
Virginia	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt

The metadata of each file was also obtained. Attached is a spreadsheet showing the file creation date, date of modification, and last accessed date. Please note that for the “test.txt,” **file most recent last access date was February 18, 2015.**

We note that Quintara revised its trade secret file designation on April 21, 2021, and included more than 10,000 additional files (QB009560 – 9790, 9247 – 9251, 9791 – 9858, 10784 – 020860). Most of these additional files are invoices, and even included COVID fliers. We have seen the constantly shifting sands around Quintara’s alleged trade secrets many, many times by now. It is this type of time wasting tactics that establish that Quintara and its principals are maintaining this action in bad faith. *Swarmify v. Cloudfare, Inc.*, 2018 WL 4690177, *7 (N.D. Cal. Sept. 17, 2019) (Judge Alsup awarding bad faith fees against the plaintiff).

If necessary, we will have our forensic vendor submit a declaration to Magistrate Judge Tse for his in camera review confirming their findings. We do not intend to waive our privilege before expert disclosures are set to occur.

We strongly encourage Quintara to dismiss with prejudice its baseless Defend Trade Secrets Act claim. When we defense this action, Defendants will seek to recover their attorneys’ fees, expert fees and costs for this objectively specious claim brought in bad faith under the DTSA. Quintara’s continued pursuit of its baseless DTSA claim, which lacked merit from the outset, will only add to Defendants’ considerable attorneys’ fees and costs.

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

QUINTARA BIOSCIENCES, INC.,

Plaintiff,

v.

RUIFENG BIZTECH INC., et al.,

Defendants.

Case No. 20-cv-04808-WHA (AGT)

ORDER RE: DISCOVERY DISPUTES

Re: Dkt. Nos. 97, 101

As stated at today's hearing, the Court, at this time, will not require defendants to make available for a forensic inspection the eleven computers at issue in the Hayward Office. Instead, plaintiff, by April 21, 2021, must provide defendants with a detailed description of what to search for on the computers. The more specifics plaintiff can provide, the better. Defendants, by April 23, 2021, must search all eleven computers, looking for the information that plaintiff has identified. Defendants must provide plaintiff with the results of the search, also by April 23.¹

By April 30, 2021, plaintiff must substantively respond to the contention interrogatories at issue: defendants' interrogatories nos. 3, 5–8, and 10–12. For avoidance of doubt, plaintiff's request for sanctions in response to the interrogatory dispute is denied.

Any future discovery disputes in the case must be raised in compliance with Part VII.B of the undersigned's civil standing order, available at cand.uscourts.gov.

IT IS SO ORDERED.

Dated: April 16, 2021



ALEX G. TSE
United States Magistrate Judge

¹ To the extent that further discovery of the computers is needed, defendants represented that the computers' hard drives have been imaged and that the evidence will be preserved.

Message

From: Daniel Peterson [petersond@lilaw.us]
Sent: 4/21/2021 11:55:17 PM
To: Wiseman, Dylan W. [dwiseman@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]; Smith, Amy [asmith@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; docket [docket@buchalter.com]
CC: lij@lilaw.us; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]
Subject: Quintara v. Ruifeng et al.: Quintara letter re computers
Attachments: image001.png; 21 0421_Decl of Zhao re Computers.pdf; COS.pdf

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Dear Counsel,

Please find the following declaration attached along with Certificate of Service:

- DECLARATION OF XUELING ZHAO RE: LABOTORY COMPUTERS

This document contains information designated as "Highly Confidential—Attorney's Eyes Only" under the stipulated protective order.

I have also identified the following bates ranges as the data-dumps from the Customer Profile Database and Vendor Database, as well as the MySQL files of the databases:

- Customer Profile Database dump
 - QB007849-8027
 - 8078-8254
 - 8271-8780
 - 8811-8818
 - 8820-8823
 - 8833-8838
 - 8841-8853
 - 8865-8866
 - 8871
 - 8873
 - 8876
 - 9027-9051
 - 9068-9069
 - 9110
 - 9560 - 9790
 - QB010784 – 020860
- Vendor Database dump
 - QB008255-8257
 - 8862-8864
 - 9246-9251
 - 9255-9382
 - 9385-9388
 - 9391-9425
 - 9522-9559
- MySQL
 - QB009791 - 9858

Thank you,
 Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.251.4385. www.lilaw.us

LILAW INC.

J. James Li, Ph.D. (SBN 202855, lij@lilaw.us)
Daniel R. Peterson (SBN 326798, petersond@lilaw.us)
Andrew Pierz (SBN 292970, pierza@lilaw.us)
1905 Hamilton Avenue, Suite 200
San Jose, California 95125
Telephone: (650) 521-5956
Facsimile: (650) 521-5955

Attorneys for Plaintiff QUINTARA BIOSCIENCES, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

QUINTARA BIOSCIENCES, INC., a California
corporation,

Plaintiff,
v.

RUIFENG BIZTECH INC., a California
corporation, GANGYOU WANG, an individual,
ALEX WONG, an individual, ALAN LI, an
individual, RUI SHAO, an individual, and RF
BIOTECH LLC, a California limited liability
company,

Defendants.

Case No. 3:20-cv-04808-WHA

**DECLARATION OF XUELING ZHAO
RE: LABOTORY COMPUTERS**

**THIS DOCUMENT CONTAINS INFORMATION DESIGNATED AS
HIGHLY CONFIDENTIAL—ATTORNEY'S EYES ONLY
UNDER THE STIPULATED PROTECTIVE ORDER**



1 I, Xueling "Sue" Zhao, Ph.D., state and declare:

2 1. I am the General Manager and co-founder of Quintara Biosciences, Inc., ("Quintara")
3 a California corporation that specializes in DNA sequence analysis and related services. The facts
4 stated herein are based on my personal knowledge, discussions with company personnel and my
5 review of the records kept in the ordinary course of business. I could and would testify truthfully to
6 these facts, under oath, if required.

7 2. Before March 9, 2020, the lab located at 3563 Investment Blvd. Hayward, CA 94545,
8 served as Quintara's home base and headquarters. On March 9, 2020, Gangyou Wang ("Wang")
9 changed the locks on the offices of 3563 Investment Blvd. and prevented any Quintara employees
10 from accessing their offices. When Quintara demanded the return of their property and equipment
11 located inside, Wang refused and claimed 51% ownership of the equipment based on a sham
12 collaboration agreement. The assets include, but are not limited to, 11 company desktop computers
13 and a laptop computer. Of these computers, eight are Dell brand computers, two are custom built
14 computers, one is a Dell server computer, and one is an HP laptop. We are still in the process of
15 finding out more details about the laptop computer.

16 3. These computers contain trade secrets and confidential business information of
17 Quintara including the following two categories of trade secrets which I understand are active in this
18 case:

- 19 a. Quintara's customer profile database including services or products each customer
20 has purchased from Quintara, the amount of money it has spent with Quintara,
21 analysis of what other products and services of Quintara that each customer may
22 also be interested in based on its purchase behavior; and
23 b. Quintara's database of external vendors, partners, and consultants for products and
24 pricing.

25 4. Both the customer profile and vendor database are part of Quintara's comprehensive
26 business database named "QB Online." The following is a description of the relevant features of the
27 laboratory computers as of March 9, 2020 when they were seized from Quintara's control.

28 5. The eight Dell brand computers are the control computers for the eight sequencers in



1 the lab, one computer for each sequencer. These are also ordinary Windows-based desktop computers
2 that can be used for any office tasks and were indeed used for other office tasks. Each of the
3 sequencer-controlling computers contained four separate storage drives, C, D, E, and F. The C drive
4 acted as the operating software drive and contained the "My Document" folder as the default
5 document location. The D drive contained the following file path: "D:\AppliedBiosystems\database".
6 This folder contained subfolders and data files for database table and index, including those generated
7 from the customer profile and vendor database. The E drive's folder "E:\AppliedBiosystems\UDC\
8 DataCollection\data" contained customers' sequencing data, including all data associated with
9 customer's order such as the customer username, order ID, and the customer's confidential
10 sequencing data which are part of the customer profile data base. The F drive folder
11 "F:\AppliedBiosystems\database" contained an automatic duplicate of the D drive database
12 information.

13 6. The two custom computers were used by lab technicians including Defendants Alex
14 Wong, Alan Li, and Rui Shao, for all office related works. The C drive's "My Document" and
15 "Desktop" folders contained the daily processing record text files and PDF files for all customer
16 orders in addition to the Quintara Primer database and Daily Processing Template file. These items
17 were also part of the customer profile database.

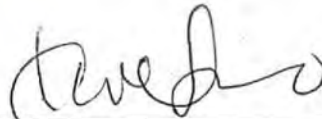
18 7. Wong, Li and Shao received regular updates and reports from the customer profile
19 database via email and Google drive. These updates were in excel spreadsheets or other formats and
20 contained the trade secret customer profile data. The "Download" folder or "My Document" folder of
21 Alex Wong, Alan Li, and Rui Shao on the two custom-made computers thus contained many relevant
22 files for the customer profile database. The two custom computers should also have customer profile
23 data in the emails and Google drives of Wang, Li and Shao.

24 8. The server computer/staging server is also a Dell computer, and contains several
25 drives, all of which contain customer profile data. Customer sequencing data were temporally stored
26 on this computer, before being automatically quality checked, and copied to QB Online database for
27 users to download. It contains customer Illumina next generation sequencing data. It also contains
28 reports generated for certain customer projects and some vendor quotations and payment records.



1 9. In addition to the 11 desk top computers, there is an HP laptop computer which is used
2 by lab technicians for many purposes, including for typing up the daily processing form to be
3 imported into the sequencer for order processing. I do not have any detailed information about the
4 laptop, but the likelihood is high that it should have emails, Google drive data, and downloaded files
5 that contain data from the customer profile and vendor database.

6
7 I declare under penalty of perjury under the laws of the United States and California that the
8 foregoing is true and correct to the best of my knowledge. This declaration is executed on Tuesday,
9 April 20, 2021 in Boston, Massachusetts.

10
11
12 

13 Xueling Zhao
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



LILAW INC.

J. James Li, Ph.D. (SBN 202855, lij@lilaw.us)
Daniel R. Peterson (SBN 326798, petersond@lilaw.us)
Andrew Pierz (SBN 292970, pierza@lilaw.us)
1905 Hamilton Avenue, Suite 200
San Jose, California 95125
Telephone: (650) 521-5956
Facsimile: (650) 521-5955

Attorneys for Plaintiff QUINTARA BIOSCIENCES, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

QUINTARA BIOSCIENCES, INC., a California
corporation,

Plaintiff,
v.

RUIFENG BIZTECH INC., a California
corporation, GANGYOU WANG, an individual,
ALEX WONG, an individual, ALAN LI, an
individual, RUI SHAO, an individual, and RF
BIOTECH LLC, a California limited liability
company,

Defendants.

Case No. 3:20-cv-04808-WHA

CERTIFICATE OF SERVICE



CERTIFICATE OF SERVICE

I, Daniel Peterson, declare that I am over the age of eighteen years and not a party to the within action. I am employed by the law firm LiLaw Inc. My business address is 1905 Hamilton Avenue, Suite 200, San Jose, California 95125.

On April 21, 2021, I served the interested party in this action the following document(s):

- **DECLARATION OF XUELING ZHAO RE: LABOTORY COMPUTERS**

By placing a true copy of the above described document(s) to the address(es) on the service list as follows:

☐ (BY MAIL) I deposited the document(s) by First Class Mail. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under this practice, the served document(s) would be placed in a U.S. Postal Service collection box or the local USPS Post Office on the same business day in a sealed envelope with postage thereon fully prepaid at San Jose, California, in the ordinary course of business to the party(ies) listed in the service list.

☐ (BY FACSIMILE) Based on an agreement of the parties to accept service by Facsimile transmission from 650-521-5955, I caused all of the pages of the above-entitled document(s) to be sent to the party(ies) at the fax number listed on the service list. No error was reported by the fax machine that I used.

☒ (BY ELECTRONIC SERVICE) I caused an electronic copy of the above listed document(s) to be mailed electronically to the email address(es) set forth on the service list.

I declare under the penalty of perjury under the laws of United States and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on April 21, 2021, in California.



Daniel Peterson



Service List

Dylan W. Wiseman (email: dwiseman@buchalter.com)
Amy Smith (email: asmith@buchalter.com)
Brandon Carr (email: bcarr@buchalter.com)
Tiffany F. Ng (email: tng@buchalter.com)
Docket (email: docket@buchalter.com)

Buchalter
55 Second Street, Suite 1700
San Francisco, California 94105-3493
Phone: (415) 227-0900
Fax: (415) 227-0770

*Counsel for Defendants RUIFENG BIZTECH INC, GANGYOU WANG, ALEX WONG, ALAN LI,
RUI SHAO, RF BIOTECH LLC*



Buch_0005267

Onsite list of DNA Systems

Computer Name	Hit word	Path	Size (bytes)
Tennessee	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Bengal	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Oregon	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Vera	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Roxanne	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Hawaii	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174
Virginia	test.txt	E:\AppliedBiosystems\UDC\DataCollection\SupportFiles\ga3730\ServiceModules\test.txt	174

Created	Modified	Accessed
2003-Dec-16 01:46:20 UTC	2003-Dec-16 01:46:20 UTC	2014-Jan-02 23:01:32.906250 UTC
2003-Dec-16 00:46:20 UTC	2003-Dec-16 00:46:20 UTC	2013-Aug-16 06:35:12.265625 UTC
2003-Dec-16 01:46:20 UTC	2003-Dec-16 01:46:20 UTC	2013-Dec-31 23:00:34.390625 UTC
2003-Dec-16 00:46:20 UTC	2003-Dec-16 00:46:20 UTC	2012-Jul-28 01:42:56.734375 UTC
2003-Dec-16 01:46:20 UTC	2003-Dec-16 01:46:20 UTC	2010-Jan-19 22:25:18.078125 UTC
2003-Dec-16 00:46:20 UTC	2003-Dec-16 00:46:20 UTC	2013-Sep-03 04:35:01.703125 UTC
2003-Dec-16 01:46:20 UTC	2003-Dec-16 01:46:20 UTC	2015-Feb-18 05:13:37.734375 UTC

EXHIBIT 11

Videotaped Deposition of

Gangyou Wang

30(b)(6)

April 22, 2021

Quintara Biosciences

vs.

Ruifeng Biztech



Gangyou Wang

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 --oOo--
4 QUINTARA BIOSCIENCES, INC.,
5 a California corporation,
6 Plaintiff,
7 vs. Case No.
8 RUIFENG BIZTECH, INC., a 3:20-cv-04808-WHA
9 California corporation, GANGYOU
10 WANG, an individual, ALEX WONG,
11 an individual, ALAN LI, an
12 individual, RUI SHAO, an individual,
13 and RF BIOTECH LLC, a California
14 limited liability company
15 Defendants.
16
17 AND RELATED CROSS-ACTIONS.
18
19
20 REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF
21 GANGYOU WANG
22
23
24 April 22, 2021
25
26
27 REPORTED BY:
28 DELAINE HALL, Sonoma, California
29
30 CSR 10164
31
32 JOB NO. 10081084

Gangyou Wang

1 BE IT REMEMBERED that, pursuant to notice
2 and on Thursday, April 22, 2021, commencing at 9:07
3 a.m., thereof, at San Francisco, California, before
4 me, DELAINE HALL, a Certified Shorthand Reporter,
5 remotely appeared

6 --oOo--

7 BO HUANG

8 Certificate No. 301565

9 having been first duly sworn to interpret from
10 English into Mandarin and Mandarin into English the
11 following proceedings:

12 GANGYOU WANG

13 having been first duly sworn to tell the truth
14 testified as follows:

15 --oOo--

16

17

18

19

20

21

22

23

24

25

Gangyou Wang

Quintara Biosciences vs.
Ruifeng Biztech

A P P E A R A N C E S

(All parties appearing remotely.)

FOR THE PLAINTIFF:

LILAW, INCORPORATED
1905 Hamilton Avenue, Suite 200
San Jose, California 95125
BY: J. JAMES LI, Ph.D, Attorney at Law
(650) 521-5956
lij@lilaw.us

FOR THE DEFENDANTS:

BUCHALTER LAW FIRM
500 Capitol Mall, Suite 1900
Sacramento, California 95814
BY: DYLAN W. WISEMAN, Attorney at Law
(916) 945-5185
dwiseman@buchalter.com

ALSO PRESENT: SUE ZHAO, Quintara
MIMI LAIN, Check Interpreter,
Certificate No. 301079
RALNA RAMSE, Videographer

Gangyou Wang

1	I N D E X		
2	EXAMINATION BY:		PAGE
3	MR. LI:		6
4	EXHIBITS MARKED FOR IDENTIFICATION		
5	NUMBER	DESCRIPTION	PAGE
6	(Exhibits are not consecutively marked.)		
7	Exhibit 2	Chinese version of Cooperation Agreement dated December	103
8		23, 2013	
9	Exhibit 2A	Translated version of Cooperation Agreement dated	103
10		December 23, 2013	
11	Exhibit 3	Services Agreement dated	116
12		February 21, 2014	
13	Exhibit 13	Articles of Incorporation of a General Stock Corporation	20
14		filed December 3, 2013	
15	Exhibit 14	Organizational chart	33
16	Exhibit 14A	Screen shot	41
17	Exhibit 16	Department of Homeland Security Notice of Action	74
18		dated March 18, 2014	
19		Bates QB007482 to 7485	
20	Exhibit 17	Notice of Revocation of Non-immigration Petition	76
21		dated September 12, 2017	
22	Exhibit 18	Email chain ending with an email from Gangyou Wang	84
23		to Richard Shan dated October 18, 2019	
24		Bates QB000878 to 880	
25	Exhibit 19	Photocopy of green card of Gangyou Wang dated	126
		October 5, 2017	

Gangyou Wang

Quintara Biosciences vs.
Ruifeng Biztech

1 April 22, 2021 9:07 a.m.

2 P R O C E E D I N G S

3 --oOo--

4 VIDEO OPERATOR: We're now on the record.
5 Today's date is April 22nd, 2021, and the time is
6 9:07 a.m. This is the remote video-recorded
7 deposition of Gangyou Wang via Zoom video conference
8 being taken in the Quintara Biosciences versus
9 Ruifeng Biztech, et al, taken on behalf of the
10 plaintiff. This witness is appearing remotely from
11 San Francisco, California.

12 My name is Ralna Ramse appearing for Aptus
13 Court Reporting located at 600 West Broadway, Suite
14 300 in San Diego, California. I'm the official
15 videographer for this deposition, and this recording
16 is the only authorized video recording of this
17 deposition. Any other video recording of this
18 deposition is unauthorized. The audio and video
19 recording will take place at all times unless al
20 counsel agree to go off the record.

21 Will counsel please identify yourselves
22 and state whom you represent.

23 MR. LI: James Li for Plaintiff Quintara.

24 MR. WISEMAN: This is Dylan Wiseman from
25 Buchalter Law Firm on behalf of defendant.

Gangyou Wang

1 MR. LI: Hey, Mr. Wiseman, your sound is
2 really bad.

3 MR. WISEMAN: I think it's because --

4 COURT REPORTER: Can we go off the record,
5 please?

6 MR. WISEMAN: Yes.

7 MR. LI: Yes.

8 VIDEO OPERATOR: Off the record at 9:08
9 a.m.

10 (Technical interruption.)

11 VIDEO OPERATOR: We are back on the record
12 at 9:20 a.m.

13 The court reporter today is Delaine Hall,
14 and she may now swear in the witness.

15 (Whereupon, the interpreters and witness
16 were duly sworn.)

17 EXAMINATION

18 BY MR. LI:

19 Q. Good morning, Mr. Wang.

20 A. Hello. Attorney Mr. Li, thank you for
21 serving as attorney for a bunch of kids. That must
22 be very hard on you.

23 Q. I move to strike as nonresponsive.

24 Have you ever been deposed?

25 MR. WISEMAN: Hold on.

Gangyou Wang

1 Biztech, Inc., right? That's shown here.

2 A. Yes.

3 Q. Okay. And six days later after you
4 submitted your petition on March 18, your petition
5 was granted, right?

6 A. Yes.

7 Q. Okay. And I have one more question for
8 that. According to this notice your visa lasted
9 until March 17, 2015; is that right?

10 A. I believe so.

11 Q. So around March 17, 2015, you filed a
12 petition to extend your L1 visa; is that right?

13 A. I believe so.

14 MR. LI: Madam Videographer, would you
15 please distribute Exhibit 17?

16 (Exhibit 17 was marked for
17 identification.)

18 VIDEO OPERATOR: Okay.

19 BY MR. LI:

20 Q. So sometime in 2017, USCIS, United States
21 Citizenship and Immigration Services, revoked your
22 L1 visa, correct?

23 MR. WISEMAN: I'm going to object -- go
24 ahead.

25 THE WITNESS: No.

Gangyou Wang

1 BY MR. LI:

2 Q. You received a notice of intent to revoke
3 your visa, correct?

4 MR. WISEMAN: I'm going to object again on
5 the grounds this has nothing to do with any of the
6 two remaining trade secrets claims in this case and
7 this smacks of bad faith. And I'll allow one or two
8 more questions, but this has nothing to do with any
9 of the issues in the case.

10 MR. LI: We disagree.

11 THE WITNESS: Yes.

12 MR. LI: And would you please download
13 Exhibit 17?

14 THE INTERPRETER: Counsel, can we do a
15 document sharing on the screen please, because once
16 I do that, I get kicked off from the -- from the
17 Internet.

18 MR. LI: Okay, of course.

19 THE INTERPRETER: I appreciate it. Thank
20 you. It happened to me last time.

21 MR. LI: Yeah, we were wondering what
22 happened to you.

23 Q. So you recognize this document, what this
24 document is?

25 A. The letter is in English. I do not

Gangyou Wang

1 how you explain why he eventually occupied the lab.
2 Okay? So that's the reason behind it. And we are
3 going to take you to the court on this.

4 MR. WISEMAN: All right. I mean, I don't
5 see how his immigration status has anything to do
6 with whether or not they are the lawful tenants,
7 whether or not there's ownership of intellectual
8 property. His immigration status is totally
9 unrelated to that. This is just purely for
10 harassment purposes.

11 MR. LI: I explained to you. If you want
12 to instruct not to answer, I cannot stop you.

13 MR. WISEMAN: I'm going to instruct him
14 not to answer. We're done with this topic.

15 MR. LI: That's fine. That's fine.

16 MR. WISEMAN: You don't get to engage in
17 unfettered discovery. You get to engage in
18 discovery that's related to the misappropriation of
19 trade secrets which occurred 15, 16 months after all
20 of this. So I have no idea how this is related at
21 this point in time. I allowed this to go. I've
22 been very generous. I still don't see it even
23 though you walked him through it. It makes no sense
24 to me.

25 MR. LI: Okay. That's fine.

Gangyou Wang

1 MR. WISEMAN: His immigration status is
2 unrelated to --

3 MR. LI: You need to stop. You need to
4 stop.

5 MR. WISEMAN: -- misappropriation of trade
6 secrets.

7 MR. LI: You need to stop your speech.
8 Okay? I'll move on. If you instruct not to answer,
9 I move on.

10 MR. WISEMAN: I'm instructing him not to
11 answer. This goes right to our bad faith claim. So
12 I've happily allowed this to go as long as it seemed
13 reasonable. Now it's just ridiculous.

14 MR. LI: You need to stop. Okay?

15 Q. So you have known Dr. Shan since 2013; is
16 that right?

17 A. Yes. In October of 2013 I think.

18 Q. And over the years Dr. Shan and you tried
19 several other collaboration projects besides
20 Quintara, correct?

21 A. Yes.

22 Q. Do you remember in April 2014, Dr. Shan
23 introduced you to a project called Berkeley Chinese
24 Center? Do you remember that?

25 A. I have no recollection. Besides that, I

Gangyou Wang

1 CERTIFICATE OF SHORTHAND REPORTER

2
3 I, Delaine Hall, Certified Shorthand
4 Reporter, the officer before whom the
5 foregoing proceedings were taken, do hereby
6 certify that the foregoing transcript is a true
7 and correct record of the proceedings; that said
8 proceedings were taken by me stenographically and
9 thereafter reduced to typewriting under my
10 supervision; and that I am neither counsel for,
11 related to, nor employed by any of the parties to
12 this case and have no interest, financial or
13 otherwise, in its outcome.

14 Further, that if the foregoing pertains to the
15 original transcript of a deposition in a federal case,
16 before completion of the proceedings, review of the
17 transcript [X] was [] was not requested.

18 IN WITNESS WHEREOF, I have hereunto set
19 my hand and affixed my signature this 28th day of
20 April 2021.

21
22 
23 _____

24 DELAINE HALL, CSR 10164
25

Gangyou Wang**Quintara Biosciences vs.
Ruifeng Biztech**

DECLARATION UNDER PENALTY OF PERJURY

Case Name: Quintara Biosciences vs. Ruifeng Biztech

Date of Deposition: 04/22/2021

Job No.: 10081084

I, GANGYOU WANG, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2021, at _____.

GANGYOU WANG

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20____,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

EXHIBIT 12

Rui Shao

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

QUINTARA BIOSCIENCES, INC.,

a California corporation,

Plaintiff,

-against-

Case No.
3:20-CV-04808-WHA

RUIFENG BIZTECH, INC., a
California corporation,
GANGYOU WANG, an individual,
ALEX WONG, an individual,
RUI SHAO, an individual, and
RF BIOTECH, LLC, a California
limited liability company,

Defendants.

_____/

AND RELATED CROSS-ACTIONS

_____/

REMOTE VIDEOTAPED DEPOSITION OF RUI SHAO

May 6, 2021

Reported by:
Judi Johnson, CSR, RMR, RPR, CRR, CLR
California CSR #: 14174
Job No.: 10082053

Rui Shao

WITNESSES: RUI SHAO PAGE

LI7

INDEX OF PLAINTIFF'S EXHIBITS

I.D.	DESCRIPTION	PAGE
Exhibit 33	Bates document QB006696-6700	60
Exhibit 34	Bates document QB006843-6900	76
Exhibit 35	Bates document QB007093-7098	133

INDEX OF DEFENDANT'S EXHIBITS

I.D.	DESCRIPTION	PAGE
Exhibit 1	Flir document	134

Rui Shao

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 QUINTARA BIOSCIENCES, INC.,
4 a California corporation,
5 Plaintiff,
6 -against- Case No.
7 RUIFENG BIZTECH, INC., a 3:20-CV-04808-WHA
8 California corporation,
9 GANGYOU WANG, an individual,
10 ALEX WONG, an individual,
11 RUI SHAO, an individual, and
12 RF BIOTECH, LLC, a California
13 limited liability company,
14 Defendants.
15
16
17
18
19 AND RELATED CROSS-ACTIONS
20
21
22
23
24
25 Remote Videotaped Deposition of RUI SHAO,
held via Zoom, pursuant to Notice, before Judi
Johnson, a Certified Stenographic Reporter, a
Registered Merit Reporter, a Registered Professional
Reporter, a Certified Realtime Reporter and a
Certified LiveNote Reporter on May 6, 2021 at 9:00
a.m. PST.

Rui Shao

1 APPEARANCES: (ALL PARTIES APPEARING REMOTELY VIA ZOOM)

2 LI LAW, INCORPORATED

3 Attorneys for the Plaintiff

4 1905 Hamilton Avenue - Suite 200

5 San Jose, California, 95125

6 BY: J. JAMES LI, ESQ.
7

8
9 BUCHALTER

10 Attorneys for the Defendant

11 500 Capitol Mall - Suite 1900

12 Sacramento, California 95814

13 BY: DYLAN W. WISEMAN, ESQ.
14

15

16

17

18

19

20 ALSO PRESENT:

21 SUE ZHAO - QUINTARA

22 BO HUANG - INTERPRETER

23 MIMI LAIN - CHECK INTERPRETER

24 GANGYOU WANG

25 RALNA RAMSE - LEGAL VIDEO SPECIALIST

Rui Shao

1 IT IS HEREBY STIPULATED AND AGREED by and
2 between the attorneys for the respective parties
3 herein, that filing and sealing and the same are
4 hereby waived.

5 IT IS FURTHER STIPULATED AND AGREED that
6 all objections, except as to the form of the
7 question, shall be reserved to the time of the
8 trial.

9 IT IS FURTHER STIPULATED AND AGREED that
10 the within deposition may be sworn to and signed
11 before any officer authorized to administer an oath,
12 with the same force and effect as if signed and
13 sworn to before the Court.

14
15 - o0o -
16
17
18
19
20
21
22
23
24
25

Rui Shao

1 BY THE REPORTER:

2 Q Please state your name and address for the
3 record.

4 A Rui Shao, 482 East Isidoro Avenue, Tracy,
5 California.

6 THE VIDEOGRAPHER: We are now on the
7 record. Today's date is May 6th, 2021 and the time
8 is 9:03 a.m. This is the remote video recorded
9 deposition of Rui Shao via Zoom videoconference.
10 Being taken in the matter of Quintara Biosciences
11 versus Ruifeng Biztech, Inc., et al. on behalf of
12 the plaintiff. The witness is appearing remotely
13 from Tracy, California.

14 My name is Ralna Ramse of Aptus Court
15 Reporting located at 600 West Broadway, Suite 300 in
16 San Diego, California. I'm the official
17 videographer for this deposition. And this
18 recording is the only authorized video recording of
19 this deposition. Any other video recording of this
20 deposition is unauthorized. The audio and video
21 recording will take place at all times unless all
22 counsel agree to go off the record.

23 Will counsel please identify yourselves and
24 state whom you represent.

25 MR. LI: J. James Li for plaintiff Quintara

Rui Shao

1 Bioscience.

2 MR. WISEMAN: Dylan Weissman on behalf of
3 the defendants.

4 THE VIDEOGRAPHER: The court reporter today
5 is Judi Johnson and she may now swear in the
6 interpreter and deponent.

7 BO HUANG, having been duly sworn to
8 interpret questions asked in English into Chinese
9 and answers answered in Chinese into English as
10 follows.

11 MIMI LAIN, having been duly sworn to
12 interpret questions asked in English into Chinese
13 and answers answered in Chinese into English as
14 follows.

15 RUI SHAO, called as a witness herein,
16 having first been duly sworn, was examined and
17 testified as follows:

18 EXAMINATION

19 BY MR. LI

20 Q Good morning, Mr. Shao.

21 A Good morning.

22 Q I'm James Li, like I said at the beginning,
23 I represent Quintara Biosciences. And before we
24 start, can you identify your name and address for
25 the record, please?

Rui Shao

1 and answered.

2 BY MR. LI

3 Q You have never downloaded WeChat app onto
4 your iPad, yes or no?

5 MR. WISEMAN: Objection. Objection. Asked
6 and answered.

7 It's getting to be harassing, but go ahead
8 and answer him.

9 THE WITNESS: I have to repeat what I said.
10 I do not recall having downloaded any app onto the
11 iPad. The iPad has been exclusively used for my
12 kids.

13 BY MR. LI

14 Q What was the reason for you not to use your
15 laptop at the beginning of this deposition?

16 A I believe everybody saw that I turn up this
17 laptop to get into Zoom at the beginning of this
18 deposition. Yet, there was no audio on the Zoom.
19 That is why I have shifted to the cellular phone.

20 Q But before this deposition, you never tried
21 to use your Zoom to practice, to see whether it
22 works, is that what you're saying?

23 A I have never used Zoom. How could I
24 possibly try to see if it worked in the past? We
25 work night shifts. We never had to use Zoom.

Rui Shao

1 Q So how did you make it work this time?

2 MR. WISEMAN: Okay. Hold on.

3 Objection. This is getting to be

4 harassing. I'm gonna be really clear again. You're

5 not getting a second day with this witness. This is

6 it. You've named him as a defendant in a federal

7 lawsuit with no evidence other than he went to go to

8 work for one of two business partners.

9 And, counsel, you got between now and 5:00

10 to get to some substantive issues in the case.

11 We've been wasting our day yet again. You know,

12 the -- this case has the stench of a trade secrets

13 bad faith case. And I've seen this for 20 years,

14 and this is one of the worst ones I've ever seen.

15 And again, I'm going to direct you to the

16 Flir Systems case, F-L-I-R Systems versus Parish. I

17 don't think you've read it because it talks all

18 about how the manner in which the plaintiff

19 litigates its trade secrets claim is a major factor

20 in whether or not they're subject of bad faith. All

21 we've done today is waste everybody's time.

22 MR. LI: I don't appreciate you wasting my

23 time here, okay?

24 BY MR. LI

25 Q All right. Let me go back. Okay. We're

Rui Shao

C E R T I F I C A T E

I, JUDI JOHNSON, a stenographic reporter and RMR,
RPR, CRR, CSR, CLR, do hereby certify:

THAT the witness whose testimony is hereinbefore
set forth, was duly sworn by me; and

THAT the within transcript is a true record
of the testimony given by said witness. I further
certify that I am not related, either by blood or
marriage, to any of the parties to this action; and

THAT I am in no way interested in the outcome of
this matter.

Further, that if the foregoing pertains to the
original transcript of a deposition in a federal case,
before completion of the proceedings, review of the
transcript ☐ was ☒ was not requested.

IN WITNESS WHEREOF, I have hereunto set
my hand this 17th day of May, 2021.



JUDI JOHNSON, RMR, CRR, RPR, CLR, CSR

Rui Shao

DECLARATION UNDER PENALTY OF PERJURY

Case Name: Quintara Biosciences vs. Ruifeng Biztech

Date of Deposition: 05/06/2021

Job No.: 10082053

I, RUI SHAO, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2021, at _____.

RUI SHAO

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20____,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

EXHIBIT 13

Yi Qing Chen

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3
4 QUINTARA BIOSCIENCES, INC.,
a California corporation,
5 Plaintiff,
6 vs. Case No.
3:20-cv-04808-WHA
7 RUIFENG BIZTECH, INC., a
California corporation, GANGYOU
8 WANG, an individual, ALEX WONG,
an individual, ALAN LI, an
9 individual, RUI SHAO, an
individual, and RF BIOTECH LLC,
10 a California limited liability
company,
11 Defendants.
12
13
14 AND RELATED CROSS-ACTIONS
15
16
17 VIDEOTAPED DEPOSITION OF YI QING CHEN,
18 a/k/a CHRISTINE CHEN
19
20 Conducted virtually via remote videoconference
21 May 5, 2021
22
23
24 Reported by:
Misty Klapper, RMR, CRR
25 Job No.: 10082279

Yi Qing Chen

Quintara Biosciences vs.
Ruifeng Biztech

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

QUINTARA BIOSCIENCES, INC.,
a California corporation,

Plaintiff,

vs.

Case No.
3:20-cv-04808-WHA

RUIFENG BIZTECH, INC., a
California corporation, GANGYOU
WANG, an individual, ALEX WONG,
an individual, ALAN LI, an
individual, RUI SHAO, an
individual, and RF BIOTECH LLC,
a California limited liability
company,

Defendants.

AND RELATED CROSS-ACTIONS

Videotaped deposition of YI QING CHEN, a/k/a
CHRISTINE CHEN, taken on behalf of Plaintiff, via
Zoom remote videoconference, beginning at 9:04 a.m.
on Wednesday, May 5, 2021, before Misty Klapper,
RMR, CRR.

Yi Qing Chen

1 APPEARANCES:

2 (ALL APPEARANCES VIA ZOOM REMOTE VIDEOCONFERENCE)

3 ON BEHALF OF PLAINTIFF:

4 J. JAMES LI, Ph.D.
5 LILAW, INC.
6 1905 Hamilton Avenue, Suite 200
7 San Jose, California 95125
(650) 521-5956
E-mail: lij@lilaw.us

8 ON BEHALF OF DEFENDANTS:

9 DYLAN W. WISEMAN, ESQUIRE
10 BUCHALTER LAW FIRM
11 500 Capitol Mall, Suite 1900
12 Sacramento, California 95814
(916) 945-5185
E-mail: dwiseman@buchalter.com

13 ALSO PRESENT:

14 RALNA RAMSE, VIDEO OPERATOR

15 BO HUANG, INTERPRETER

16 AIDONG NI, CHECK INTERPRETER

17 SUE ZHAO, QUINTARA

18

19

20

21

22

23

24

25

Yi Qing Chen

1	C O N T E N T S		
2	WITNESS:	EXAMINATION BY:	PAGE:
3	Yi Qing Chen, a/k/a		
4	Christine Chen	Dr. Li	7
5			
6			
7			
8			
9	E X H I B I T S		
10	NO.:	DESCRIPTION:	PAGE:
11	Exhibit QB 24	Deposition subpoena to Yi Qing Chen,	
12		a/k/a Christine Chen, dated 4-14-21	77
13	Exhibit QB 25	TIF file, cover E-mail, Chen to	
14		Purchase RF, dated 12-7-20, Subject:	
15		12 first week statement, Bates	
16		stamped RUIFENG-CHRISTINE_00000013	119
17	Exhibit QB 26	TIF file, Screenshot of BOA checking	
18		account statement, Bates stamped	
19		RUIFENG-CHRISTINE_00000014	119
20	Exhibit QB 27	TIF file, Screenshot of BOA checking	
21		account statement, Bates stamped	
22		RUIFENG-CHRISTINE_00000015	119
23	Exhibit QB 28	TIF file, Screenshot of BOA credit	
24		card statement, Bates stamped	
25		RUIFENG-CHRISTINE_00000016	119

Yi Qing Chen

1	E X H I B I T S (CONTINUED)		
2	NO.:	DESCRIPTION:	PAGE:
3	Exhibit QB 29	TIF file, E-mail letter from	
4		RF Biotech to Chen, dated 8-3-20,	
5		Subject: In regards to your recent	
6		sequencing service disruption	
7		from March to June, Bates stamped	
8		RUIFENG-CHRISTINE_00000001	140
9	Exhibit QB 30	TIF file, E-mail string dated	
10		7-16-20 and 7-17-20, Subject: Results	
11		of order 203043 Repeat, Bates	
12		stamped RUIFENG-CHRISTINE_00000003	141
13	Exhibit QB 31	TIF file, E-mail string dated	
14		7-16-20 and 7-17-20, Subject: Results	
15		of order 203043 Repeat, Bates	
16		stamped RUIFENG-CHRISTINE_00000005	144
17	Exhibit QB 32	TIF file, Cover E-mail, Chen to Chen,	
18		dated 8-17-20, Subject: Biotech	
19		Company List, Bates stamped	
20		RUIFENG-CHRISTINE_00000007	146
21			
22			
23			
24			
25			

Yi Qing Chen

P R O C E E D I N G S

Whereupon:

BO HUANG,

was first duly sworn to interpret from English into
Mandarin and Mandarin into English the following
proceedings:

VIDEO OPERATOR: Okay. We are now
on the record. Today's date is May 5th
2021 and the time is 9:04 a.m.

This is the remote video-recorded
deposition of Christine Chen via Zoom
videoconference being taken in the matter
of Quintara Biosciences versus Ruifeng
Biztech, et al. on behalf of the
plaintiff. The witness is appearing
remotely from Hayward, California.

My name is Ralna Ramse, appearing
for Aptus Court Reporting located at
600 West Broadway, Suite 300 in San Diego,
California. I am the official
videographer for this deposition and this
recording is the only authorized video
recording of this deposition. Any other
video recording of this deposition is
unauthorized. The audio and video

Yi Qing Chen

1 recording will take place at all times
2 unless all counsel agree to go off the
3 record.

4 The court reporter today is Misty
5 Klapper and she may now swear in or affirm
6 the deponent.

7 Whereupon:

8 YI QING CHEN, A/K/A CHRISTINE CHEN,
9 was called for examination, and, after being duly
10 sworn through the interpreter, Bo Huang, was
11 examined and testified as follows:

12 EXAMINATION BY COUNSEL FOR PLAINTIFF

13 BY DR. LI:

14 Q. Good morning.

15 A. Good morning.

16 Q. Would you state your full name and
17 address for the record, please.

18 A. My home address?

19 Q. Yes.

20 A. Y. Qing Chen, 5600 Eldorado Avenue,
21 Apartment 8, El Cerrito, 94530.

22 Q. Thank you, Miss Chen.

23 A. You're welcome.

24 Q. So were you born in China?

25 A. Yes.

Yi Qing Chen

1 BY DR. LI:

2 Q. Please answer my question.

3 MR. WISEMAN: I'm going to instruct
4 her not to answer. It doesn't have
5 anything to do with any issue in the case.
6 She's here today with an interpreter.

7 BY DR. LI:

8 Q. Okay. Did you have any Mandarin
9 interpreter to help you with classes at UC Davis?

10 MR. WISEMAN: I'm -- I'm going to
11 object on relevance, privacy and harassing
12 grounds.

13 You're not answering this.

14 She's here today with an
15 interpreter, which is her right to do as a
16 person who came to this country at the age
17 of 20. So move on. Ask her the
18 questions. She's here to answer your
19 questions.

20 BY DR. LI:

21 Q. Are you a U.S. citizen?

22 A. Yes.

23 Q. When -- when did you grow up in --
24 when did you become a U.S. citizen?

25 A. It was several years ago, but I just

Yi Qing Chen

1 don't recall which specific year.

2 Q. I understand you also speak

3 Cantonese, Miss Chen; that right?

4 A. Yes.

5 Q. And did you request Cantonese

6 interpreter for this deposition?

7 A. I did.

8 Q. And originally you requested a

9 Mandarin interpreter, right?

10 CHECK INTERPRETER: The question is

11 originally you requested a Mandarin

12 interpreter; is that right?

13 MR. WISEMAN: I'm going to object

14 on attorney/client privilege grounds.

15 This has nothing to do with any issue in

16 the case. You're getting this witness for

17 one day and this is just purely intended

18 to harass this witness.

19 And I'm going to point your

20 attention, Counsel -- there's a case

21 called Flir Systems, Inc. versus Parrish.

22 And the manner in which a plaintiff

23 litigates a trade secrets claim goes to

24 the issue of subjective bad faith. And

25 none of the questions so far in the first

Yi Qing Chen

1 18 minutes of this deposition have
2 anything to do with the substance of this
3 case.

4 You're just here to harass her.
5 That's all we've heard so far. Get to the
6 questions.

7 DR. LI: I ask you again,
8 Mr. Wiseman, stop your speeches. Okay?

9 MR. WISEMAN: I'm going to make my
10 record about the bad-faith litigation that
11 you folks are pursuing so you're well
12 aware that you continue to pursue this
13 claim that has no merit whatsoever. And,
14 you know, if -- there will be consequences
15 when we prevail and recover our attorney's
16 fees for the bad-faith prosecution of this
17 Defend Trade Secrets Act claim.

18 DR. LI: I'm not going to engage a
19 debate with you here. I ask you not make
20 speeches, speaking objections. All right?

21 MR. WISEMAN: It's not a speaking
22 objection. I'm making my record. I'm
23 establishing on the record you spent
24 18 minutes harassing this witness. Flir
25 Systems, F-L-I-R Systems, versus Parrish

Yi Qing Chen

1 with two Rs. Look it up, read it.

2 BY DR. LI:

3 Q. Do you have any problem with

4 Mandarin, understanding Mandarin or speaking

5 Mandarin?

6 A. The problems that you are referring

7 to depend on the extent of the Chinese

8 proficiency.

9 Q. When you were working for Quintara,

10 you always spoke Mandarin to your colleagues,

11 right?

12 A. Do you mean in general?

13 Q. Yes.

14 A. That is up to whether that individual

15 speaks Chinese or not.

16 Q. Yes. When people speak Chinese you

17 speak Mandarin with them, correct?

18 MR. WISEMAN: Objection, asked and

19 answered.

20 Go ahead and answer.

21 THE WITNESS: If I'm spoken in

22 Chinese, I will speak Chinese.

23 BY DR. LI:

24 Q. In particular I'm talking about

25 Mandarin Chinese.

Yi Qing Chen

1 A. I do not always talk in Mandarin.

2 Q. But when people speak Mandarin at
3 Quintara, you always speak Mandarin to them,
4 correct?

5 A. Yes.

6 Q. Did anybody suggest to you to ask for
7 Cantonese interpreter two days ago?

8 A. No.

9 Q. So how come you change your mind?
10 You wanted a Cantonese interpreter two days ago.

11 MR. WISEMAN: Objection. We're not
12 answering this. Move on, Counsel. This
13 is just purely to harass the witness. It
14 has nothing to do with any issue in the
15 case. She's in need of a Cantonese
16 speaker. Move on.

17 DR. LI: Are you instructing --

18 MR. WISEMAN: Move on.

19 DR. LI: Are you instructing --

20 MR. WISEMAN: Yeah, I'm instructing
21 her not to answer because this is
22 harassing. Move on.

23 DR. LI: I want a clear record.
24 Are you instructing her not to answer,
25 sir?


Yi Qing Chen

CERTIFICATE OF NOTARY

I, MISTY KLAPPER, the officer
before whom the foregoing deposition was
taken, do hereby certify that the witness
whose testimony appears in the foregoing
deposition was duly sworn by me; that the
testimony of said witness was taken by me
in shorthand and thereafter reduced to
typewriting by me; that said deposition is
a true record of the testimony given by
said witness; that I am neither counsel
for, related to, nor employed by any of
the parties to the action in which this
deposition was taken; and, further, that I
am not a relative or employee of any
attorney or counsel employed by the
parties hereto, nor financially or
otherwise interested in the outcome of
this action.

Further, that if the foregoing pertains to the
original transcript of a deposition in a federal case,
before completion of the proceedings, review of the
transcript ☒ was ☐ was not requested.

Dated: May 14, 2021



Misty Klapper, RMR, CRR
and Notary Public

Yi Qing Chen

Quintara Biosciences vs.
Ruifeng Biztech

DECLARATION UNDER PENALTY OF PERJURY

Case Name: Quintara Biosciences vs. Ruifeng Biztech

Date of Deposition: 05/05/2021

Job No.: 10082279

I, YI QING CHEN, hereby certify
under penalty of perjury under the laws of the State of
_____ that the foregoing is true and correct.

Executed this _____ day of
_____, 2021, at _____.

YI QING CHEN

NOTARIZATION (If Required)

State of _____

County of _____

Subscribed and sworn to (or affirmed) before me on
this _____ day of _____, 20____,
by _____, proved to me on the
basis of satisfactory evidence to be the person
who appeared before me.

Signature: _____ (Seal)

EXHIBIT 14

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 4/6/2021 3:33:05 PM
To: Daniel Peterson [petersond@lilaw.us]; Carr, Brandon M. [bcarr@buchalter.com]
CC: Ng, Tiffany F. [tng@buchalter.com]; Smith, Amy [asmith@buchalter.com]; lij@lilaw.us; chenc@lilaw.us
Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

Dan

Interrogatory No. 13 provided:

20	<u>INTERROGATORY NO. 13:</u>
21	Describe all facts supporting YOUR defense in this case, including but not limited to the
22	IDENTITIES of the witnesses and documents that YOU believe support your defense.

Judge Alsup concluded that Quintara's interrogatory number 13 was improper, and was reviewing the interrogatories sequentially.

19 Number 9, 10 and 11, 12, all out because of the use of the
 20 phrase "relating to," but you can reask these with better
 21 questions.

22 (Reading):

23 "Describe all facts supporting your
 24 defense"

25 No. That's crazy.

13

1 MR. LI: Your Honor --

2 THE COURT: I'm not going to require you to answer
 3 Number 13 because you don't know all the facts that you're up
 4 against. And then the plaintiff is going to say: Well, you
 5 forgot to put that in your answer, and therefore, you can't
 6 rely -- no. It's just a trap for the unwary that I've seen a
 7 million times. 13 is out.

8 Okay. So let's go back to the one I had trouble with,
 9 which is Number 8. And what's your objection, on the defense
 10 side, to Number 8? Hello?

Yet again, these purely obstreperous, expensive, wasteful tactics show that Quintara is maintaining its DTSA claim in bad faith. Please explain how Quintara can maintain a DTSA claim, yet decline to respond to interrogatories about the elements of that claim. *Swarmify, Inc. v. Cloudfare, Inc.*, Case No. No. C 17-06957 WHA, 2018 WL 4680177, *2 (Sept. 28, 2018).

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: Wiseman, Dylan W.

Sent: Tuesday, April 6, 2021 7:21 AM

To: Daniel Peterson <petersond@lilaw.us>; Carr, Brandon M. <bcarr@buchalter.com>

Cc: Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

Dan

Read the transcript. Judge Alsup's concern was limited to Quintara's an interrogatory asking Defendants to state all facts supporting their affirmative defenses. Quintara's objections are baseless. Please provide any authority for Quintara's position by COB today.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: Daniel Peterson <petersond@lilaw.us>

Sent: Monday, April 5, 2021 4:27 PM

To: Carr, Brandon M. <bcarr@buchalter.com>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>; lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Brandon,

Thank you for the summary, it is accurate and I will provide supplemental responses by this Friday.

Regarding Interrogatories Nos. 3, 5-8, 10-12, we will stand on our objection that these requests, which seek "all facts" supporting Plaintiff's allegations and contentions, are overbroad on their face and overbroad by this Court's standard set forth in the March 24, 2021 discovery hearing. When encountering a discovery request which sought all supporting facts, Judge Alsup struck the question and described it as a "trap for the unwary". I attended this hearing and understood the Judge's order as a rebuke of Interrogatories which request "all facts" as overbroad.

Best regards,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Monday, April 05, 2021 4:14 PM

To: Daniel Peterson <petersond@lilaw.us>

Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; Smith, Amy <asmith@buchalter.com>

Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

Dan,

Below is a summary of our meet and confer call this afternoon. For those that Quintara will voluntarily amend, you agreed to do so by this Friday.

Interrogatories:

1, 2 – you will amend to state all facts known about when and what defendant(s) accessed your customer profile and vendor databases.

3, 5-8, 10-12 – you stated you will not respond to these routine contention interrogatories permitted by rule 33 because Judge Alsup said interrogatories that ask for facts are not allowed. I explained that was not the case, the judge's issue concerned interrogatories asking for all facts about *defenses* and read you the relevant portion of the transcript. (12:23-13:10). I also provided you with authority that allows contention fact interrogatories, 2019 WL 4777286. You have not provided any authority supporting your position. You stated you would discuss with Mr. Li and get back to me by the end of the day if you will voluntarily amend these. If you have any authority that supports your refusal to answers these interrogatories, please send it to us by tomorrow COB or we will seek to have it not considered at the hearing. Discovery is closing next month, we are entitled to know the facts that Plaintiff is aware of that allegedly support its allegations.

4, 9, 13— You will amend and breakdown your damages total for each of the 6 customers in detail. You will add all known facts about what allegedly happened to the relationship with these customers.

14, 15 – will amend to state plaintiff is aware of no copying at this time.

If this does not comport with your understanding of our conversation please let me know today.

Thank you.

Best,
Brandon

Brandon M. Carr | Attorney | [Buchalter](#), A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Carr, Brandon M.
Sent: Monday, April 5, 2021 11:13 AM
To: 'Daniel Peterson' <petersond@lilaw.us>
Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

Hi Dan: Yes, I will phone you at 3 pm. Best, Brandon

From: Daniel Peterson <petersond@lilaw.us>
Sent: Sunday, April 4, 2021 11:46 AM
To: Carr, Brandon M. <bcarr@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; docket <docket@buchalter.com>
Cc: lij@lilaw.us; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

	This message has originated from an External Email . Daniel Peterson < petersond@lilaw.us >:
--	---

Brandon,

Yes, I will be available for meet and confer on Monday afternoon. Will 3pm work for you?

Each of the questions propounded is either overbroad by this Court's standard or seeking information which has yet to be obtained because discovery is ongoing.

Requests 1, 2, 14, and 15 seek information that can only be confirmed through a forensic inspection of the computers at issue. As the trade secrets are contained on computers which were converted by Defendants and Plaintiff has not had an opportunity to inspect those computers, Plaintiff cannot definitively say exactly when its trade secrets have been accessed and copied. An inspection of the computers would reveal that information.

Requests 4, 9, and 13, which request Plaintiff state all damages incurred, also seek information that is incomplete because discovery is ongoing. I have provided a preliminary calculation for these requests, but the final calculation will change as discovery proceeds.

Requests 3, 5-8, and 10-12 are improperly overbroad contention interrogatories as each requests *all facts* which support Plaintiff's contentions and allegations. During the 3/24/21 discovery hearing, Judge Alsup reviewed a similar request which requested all supporting facts. Judge Alsup described the request as "a trap for the unwary" and struck it out. These responses can be supplemented as discovery proceeds and the requested information becomes available.

Thank you,

-Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
210.854.5131. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Friday, April 2, 2021 4:58 PM

To: Daniel Peterson <petersond@lilaw.us>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; docket <docket@buchalter.com>

Cc: lij@lilaw.us; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

Dan,

I'd like to set up a time to meet and confer on your responses to the special interrogatories on Monday by phone. **Please let me know what time works best.** We need to go through every response as every response is unresponsive and/or incomplete.

Most of the responses are boilerplate objections with no answer provided. Be advised, we will be seeking sanctions this time around. Not responding to straightforward requests, for example, when Defendants accessed your alleged trade secret databases and not setting forth the known facts that support YOUR allegations pled in YOUR complaint, at this late stage of the game, is outrageous.

We will bringing this to Judge Alsup's attention next week if we are unable to resolve every issue on Monday. **Please let me know when on Monday you can talk.** Thanks.

Brandon

Brandon M. Carr | Attorney | **Buchalter**, A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Daniel Peterson <petersond@lilaw.us>

Sent: Friday, April 2, 2021 4:42 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>; docket <docket@buchalter.com>

Cc: lij@lilaw.us; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: RE: Quintara v. Ruifeng et al.: Deposition Matters for Examination

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Counsel,

Please find the following discovery response attached, along with Certificate of Service and Verification:

- QUINTARA BIOSCIENCES, INC.'S RESPONSES TO DEFENDANT GANGYOU WANG'S SPECIAL INTERROGATORIES TO PLAINTIFF AND COUNTERDEFENDANT QUINTARA BIOSCIENCES, INC., SET ONE

Thank you,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 15

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 4/23/2021 11:50:18 PM
To: Daniel Peterson [petersond@lilaw.us]; Carr, Brandon M. [bcarr@buchalter.com]; Smith, Amy [asmith@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]
CC: lij@lilaw.us; chenc@lilaw.us
Subject: RE: Quintara Biosciences Inc. v. Ruifeng Biztech Inc., et al. [IWOV-BN.FID3231313]From Subject Size Received
Attachments: image001.png; Lead counsel meet and confer over discovery matters

Jim

This confirms that Quintara Biosciences abruptly decided to end the Rule 30(b)(6) deposition of Alan Li and also ended his personal testimony. As expressed today on multiple occasions, without a court order compelling his attendance, today is the only day we plan to produce Alan Li as a witness.

Under Judge Alsup's March 13, 2021 Order, the only remaining trade secrets are the vendor database. On March 23, 2021, Quintara identified the 922 files consisting of its customer profile database and vendor database.

Notably, today, before you excused Mr. Li, *you didn't ask a single question about the customer profile database or the vendor database.* Evading the truth on those issues shows Quintara is prosecuting this action in bad faith. (*Swarmify, Inc. v. Cloudfare, Inc.*, Case No. No. C 17-06957 WHA, 2018 WL 2445515, *4.)

Likewise, while you did ask general questions about certain customers and vendors, there was no effort to tie Ruifeng's interactions back to any alleged use of the customer profile database and vendor database. Burying your head in the sand further shows Quintara's bad faith.

The excuse used by Quintara to end the deposition was that it "believes" that Mr. Li did not conduct an adequate search of his records, and thus it seeks to resume the Rule 30(b)(6) deposition at a later time. Quintara contends there are documents which remain to be produced and seeks to resume Mr. Li's deposition at a later time. Absent a court order, that will not occur for several reasons.

First, my office has conducted a thorough review of the responsive documents. We have produced non-privileged documents responsive to the requests.

It came to light during the deposition that your firm incorrectly believes that it is sufficient to permit Quintara's principals and employees to conduct their own search for responsive documents. Indeed, you faulted both Mr. Wong and Mr. Li for not being more actively involved in searching for documents. Lay witnesses, particularly where they have an interest in the outcome, are not to determine the relevance of documents responsive to inspection demands. *Green v. Blitz*, 2011 WL 806011 (E.D. Tex. Mar. 1, 2011); *Nat'l Day Laborer Org. v. U.S. Immigration and Customs Enforcement Agency*, 2012 WL 2878130 (S.D.N.Y. July 13, 2012). Yet, the employee/defendants' alleged inadequacy to review their own files is why you opted to adjourn early. Please immediately confirm that your firm has not been permitting Quintara to conduct its own determination of what is relevant or responsive.

Second, the only "trade secrets" left in the case are the 922 files consisting of the Customer Profile Database and Vendor Database. Today, like ever-shifting sands, Quintara floated notion that in March of 2020, Alan Li prepared Excel spreadsheet showing the customers Quintara intended to notify of its impending COVID shut down. The Excel file which Quintara sought to inject into this case, has nothing to do with the customer profile database or vendor database.

You seem to be under the mistaken belief that Mr. Wang is in the possession of that Excel file. If that were the case, and Alan Li somehow sent that information from his Quintara email account, the evidence would be on Quintara's email server or his devices which he left at Quintara. Notably, there is no evidence to that effect. Likewise, we have searched, and Mr. Wang never had any such file. Shifting sands yet again.

Third, only today, for the first time after adjourning the deposition, your office sent its email seeking to meet and confer about inspection demands. We have been asking for weeks to meet and confer about the Rule 30(b)(6) deposition topics and the parties' pending discovery issues. You opted to delay the meet and confer process until after adjourning the deposition. I remain very doubtful that Magistrate Judge Tse will look favorably upon those tactics.

In response to your "Lead counsel meet and confer over discovery matters" message, I'm not available Monday at 5:00 p.m. to meet and confer, but please propose a time on Tuesday or Wednesday morning.

On Monday, please confirm in writing that your office has not permitted the fox to guard the hen house by allowing Quintara's principals and employees to determine what is relevant or responsive.

Thank you,

Dylan Wiseman

T (415) 227-3506
C (916) 212-6737

From: Daniel Peterson <petersond@lilaw.us>

Sent: Friday, April 23, 2021 12:53 PM

To: Carr, Brandon M. <bcarr@buchalter.com>; Smith, Amy <asmith@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Cc: lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences Inc. v. Ruifeng Biztech Inc., et al. [IWOV-BN.FID3231313]

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Brandon,

I understand that Dylan and Jim are discussing dates for deposition of Ms. Yi Chen (see attached). When this date is confirmed I will send an amended notice.

Best,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Carr, Brandon M. <bcarr@buchalter.com>

Sent: Friday, April 23, 2021 12:41 PM

To: Daniel Peterson <petersond@lilaw.us>; Smith, Amy <asmith@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>

Cc: lij@lilaw.us; chenc@lilaw.us

Subject: RE: Quintara Biosciences Inc. v. Ruifeng Biztech Inc., et al. [IWOV-BN.FID3231313]

Dan,

You did not meet and confer on dates for deposition of Ms. Yi Chen, so I understand from your email below the deposition is not going forward. We are unavailable on the date noticed. Please meet and confer and then serve the amended notice with proper documents.

Best,
Brandon

Brandon M. Carr | Attorney | [Buchalter](http://Buchalter.com), A Professional Corporation | 55 Second Street, Suite 1700 | San Francisco, CA 94105-3493 | Direct Dial: (415) 227-3636 | Cell Phone: (415) 216-8829 | Direct Fax: (415) 227-3523 | Main Number: (415) 227-0900 | bcarr@buchalter.com | www.buchalter.com | [Bio](#)

From: Daniel Peterson <petersond@lilaw.us>
Sent: Friday, April 16, 2021 12:04 PM
To: Smith, Amy <asmith@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Wiseman, Dylan W. <dwiseman@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>
Cc: lij@lilaw.us; chenc@lilaw.us
Subject: RE: Quintara Biosciences Inc. v. Ruifeng Biztech Inc., et al. [IWOV-BN.FID3231313]

This message has originated from an **External Email**. Daniel Peterson <petersond@lilaw.us>:

Counsel,

Regarding these objections, we are happy to meet and confer on the issues raised.
Regarding the timing of the deposition, we will meet and confer to find mutually agreeable dates for the deposition.
Regarding the document requests, I will revise.

We will be available for this deposition on the following dates: April 26, 27, 28, 29, and 30, as well as May 3 and 4.
We can check our availability for other dates which you may propose as well.
Please let me know your availability so that we can schedule appropriately.

Additionally, because the use of a translator slowed the pace of the deposition of Mr. Wang.
Please provide your availability to complete the deposition of Mr. Wang.
Again, we will be available for this deposition on the following dates: April 26, 27, 28, 29, and 30, as well as May 3 and 4.
We can check our availability for other dates which you may propose as well.
Please let me know your availability so that we can schedule appropriately.

Thank you,
Dan



Daniel Peterson

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.251.4385. www.lilaw.us

From: Smith, Amy <asmith@buchalter.com>
Sent: Friday, April 16, 2021 11:14 AM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>; chenc@lilaw.us
Cc: Wiseman, Dylan W. <dwiseman@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>; Ng, Tiffany F. <tng@buchalter.com>
Subject: Quintara Biosciences Inc. v. Ruifeng Biztech Inc., et al. [IWOV-BN.FID3231313]

Good morning,

Please find attached Yi Qing Chen's Objections to Deposition Subpoena for Appearance and Records.

Thank you,
Amy

Buchalter

Amy Smith

Legal Assistant to Kevin Collins, Lisa Pleau-Fuller,
Jacqueline Vu and Dylan Wiseman

T (916) 945-5199

asmith@buchalter.com

500 Capitol Mall, Suite 1900
Sacramento, CA 95814-4737

www.buchalter.com

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Message

From: lij@lilaw.us [lij@lilaw.us]
Sent: 4/23/2021 11:11:28 PM
To: Wiseman, Dylan W. [dwiseman@buchalter.com]
CC: Daniel Peterson [petersond@lilaw.us]; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]
Subject: Lead counsel meet and confer over discovery matters
Attachments: image001.png

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Mr. Wiseman:

This is our attempt to meet and confer regarding the following discovery issues:

1. Defendant Wang's refusal to produce any documents to RFP 20 and 21 regarding Wang's L-1 visa applications.
As we have stated before, these documents are very relevant to the issue of ownership of the computers and contents therein at issue. Nearly all the evidence relied upon by Defendants to claim their ownership of the computers are documents "created" for the purpose of supporting the L-1 petition, extension or appeal to the USCIS's decision to revoke the visa. Thus, we think Wang's stonewalling on this matter is inappropriate. Such documents may also be responsive to RFP 30 and 31.

1A. Related to point 1, we are communicating with Henry Hu regarding subpoena for Wang's immigration files related to Ruifeng's business. Hu says he needs Wang's consent. We will compel the response to the subpoena as well.

2. Defendants' failure to produce emails and texts in response to RFP 23, 26, 28, 20. Neither Alex Wong nor Alan were even asked to search for these documents. Defendants did not produce a single email among them.

3. Defendants' failure to produce its customer list (RFP 28)

4. Defendants' failure to produce any vendor related documents (RFP 23)

5. Renewed requests for inspection of computers. We don't find your search adequate. You cannot just holistically search documents. The search must be conducted produced using proper key words contained in the database information.

6. Request for an order to remedy Defendants' discovery abuses including improper deposition defense conducts and failure to properly search and produce documents.

We request a meet and confer as soon as possible, no later than 5 pm of Monday.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

EXHIBIT 16

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 4/26/2021 1:52:39 PM
To: lij@lilaw.us
CC: Daniel Peterson [petersond@lilaw.us]; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]; Ng, Tiffany F. [tng@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]
Subject: RE: Lead counsel meet and confer over discovery matters [IWOV-BN.FID3231313]

Jim

I'm very troubled that you continue to ignore the evidence that your client is maintaining this action in bad faith, and refuse to respond to these concerns. Myopically refusing to address our concerns about Quintara's abrupt abandonment of Alan Li's deposition because they are "very lengthy" shows Quintara is, yet again, burying its head in the sand.

I will meet and confer about Quintara's issues, and the issues we will convey later today on Wednesday morning. Amy will send over my Zoom invite for 10:00. That should afford both sides the opportunity to respond in writing to our respective concerns.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>
Sent: Friday, April 23, 2021 5:35 PM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>
Cc: Daniel Peterson <petersond@lilaw.us>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>
Subject: RE: Lead counsel meet and confer over discovery matters

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Mr. Wiseman:

To maintain the proper thread, I copy my email responses to your email here:

Mr. Wiseman:

We disagree with your lengthy statements in the entirety. We will not engage in some fruitless disputes as to whether we can retake Alan Li's deposition. At this point, we are not even asking for that. When and if that time comes, we will address your contentions.

The important task here is to meet and confer regarding the issues I presented you in my last email. You avoided to address any of those issues.

Regarding meet and confer, I asked for a time on Monday "no later than 5 pm" not 5 pm. I can talk to you anytime on Monday morning if that works for you. But if you are saying you cannot do the meet and confer any time on Monday, I will meet with you on Tuesday at 10 am on Zoom. Let me know if that works for you.

Also, at least brief responses from you in writing on all the issues we raised will be a proper thing to do before our meet and confer.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: lij@lilaw.us

Sent: Friday, April 23, 2021 4:11 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>

Cc: Daniel Peterson <petersond@lilaw.us>; chenc <chenc@lilaw.us>; Andy Pierz (pierza@lilaw.us) <pierza@lilaw.us>

Subject: Lead counsel meet and confer over discovery matters

Mr. Wiseman:

This is our attempt to meet and confer regarding the following discovery issues:

1. Defendant Wang's refusal to produce any documents to RFP 20 and 21 regarding Wang's L-1 visa applications.

As we have stated before, these documents are very relevant to the issue of ownership of the computers and contents therein at issue. Nearly all the evidence relied upon by Defendants to claim their ownership of the computers are documents "created" for the purpose of supporting the L-1 petition, extension or appeal to the USCIS's decision to revoke the visa. Thus, we think Wang's stonewalling on this matter is inappropriate. Such documents may also be responsive to RFP 30 and 31.

1A. Related to point 1, we are communicating with Henry Hu regarding subpoena for Wang's immigration files related to Ruifeng's business. Hu says he needs Wang's consent. We will compel the response to the subpoena as well.

2. Defendants' failure to produce emails and texts in response to RFP 23, 26, 28, 20. Neither Alex Wong nor Alan were even asked to search for these documents. Defendants did not produce a single email among them.

3. Defendants' failure to produce its customer list (RFP 28)

4. Defendants' failure to produce any vendor related documents (RFP 23)

5. Renewed requests for inspection of computers. We don't find your search adequate. You cannot just holistically search documents. The search must be conducted produced using proper key words contained in the database information.

6. Request for an order to remedy Defendants' discovery abuses including improper deposition defense conducts and failure to properly search and produce documents.

We request a meet and confer as soon as possible, no later than 5 pm of Monday.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 17

Message

From: Wiseman, Dylan W. [/O=BNFY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=WISEMAN, DYLAN W.550]
Sent: 4/26/2021 3:26:38 PM
To: lij@lilaw.us
CC: Daniel Peterson [petersond@lilaw.us]; chenc@lilaw.us; Andy Pierz [pierza@lilaw.us]; Ng, Tiffany F. [/o=BNFY/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Ng, Tiffany F.613]; Carr, Brandon M. [/o=BNFY/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Carr, Brandon M.66d]; Smith, Amy [/o=BNFY/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Smith, Amyc50]
Subject: RE: Lead counsel meet and confer over discovery matters [IWOV-BN.FID3231313]

Jim

This case has no merit, and is being pursued for an improper purpose. We will continue to make our detailed record of your firm's prosecution. What is unprofessional is your lack of objectivity.

I'm not available Wednesday afternoon. What time Wednesday morning works for your schedule?

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Monday, April 26, 2021 8:21 AM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>
Cc: Daniel Peterson <petersond@lilaw.us>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Ng, Tiffany F. <tng@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>
Subject: RE: Lead counsel meet and confer over discovery matters [IWOV-BN.FID3231313]

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

Obviously we disagree with your assertion of bad faith. Repeating a false statement a thousand times does not make it true. Repeating it in every correspondence borders on unprofessionalism. Let's agree to disagree on the issue of whether we are acting in bad faith and focus on the issues of the case that need to be resolved.

The urgent issue here is the multitude of discovery matters that should be resolved as soon as possible. Thus, delaying the meet and confer again to Wednesday is not a good faith effort to resolve the issues asap. But we cannot force you to meet and confer. So we will have to agree to do this on Wednesday. I can only do it on Wednesday at 4 pm. If that time works for you, we can use our Zoom room or yours.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA

650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>

Sent: Monday, April 26, 2021 6:53 AM

To: lij@lilaw.us

Cc: Daniel Peterson <petersond@lilaw.us>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>; Ng, Tiffany F. <tng@buchalter.com>; Carr, Brandon M. <bcarr@buchalter.com>

Subject: RE: Lead counsel meet and confer over discovery matters [IWOV-BN.FID3231313]

Jim

I'm very troubled that you continue to ignore the evidence that your client is maintaining this action in bad faith, and refuse to respond to these concerns. Myopically refusing to address our concerns about Quintara's abrupt abandonment of Alan Li's deposition because they are "very lengthy" shows Quintara is, yet again, burying its head in the sand.

I will meet and confer about Quintara's issues, and the issues we will convey later today on Wednesday morning. Amy will send over my Zoom invite for 10:00. That should afford both sides the opportunity to respond in writing to our respective concerns.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>

Sent: Friday, April 23, 2021 5:35 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>

Cc: Daniel Peterson <petersond@lilaw.us>; chenc@lilaw.us; Andy Pierz <pierza@lilaw.us>

Subject: RE: Lead counsel meet and confer over discovery matters

This message has originated from an External Email. lij@lilaw.us <lij@lilaw.us>:

Mr. Wiseman:

To maintain the proper thread, I copy my email responses to your email here:

Mr. Wiseman:

We disagree with your lengthy statements in the entirety. We will not engage in some fruitless disputes as to whether we can retake Alan Li's deposition. At this point, we are not even asking for that. When and if that time comes, we will address your contentions.

The important task here is to meet and confer regarding the issues I presented you in my last email. You avoided to address any of those issues.

Regarding meet and confer, I asked for a time on Monday "no later than 5 pm" not 5 pm. I can talk to you anytime on Monday morning if that works for you. But if you are saying you cannot do the meet and confer any time on Monday, I will meet with you on Tuesday at 10 am on Zoom. Let me know if that works for you.

Also, at least brief responses from you in writing on all the issues we raised will be a proper thing to do before our meet and confer.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: lij@lilaw.us

Sent: Friday, April 23, 2021 4:11 PM

To: Wiseman, Dylan W. <dwiseman@buchalter.com>

Cc: Daniel Peterson <petersond@lilaw.us>; chenc <chenc@lilaw.us>; Andy Pierz (pierza@lilaw.us) <pierza@lilaw.us>

Subject: Lead counsel meet and confer over discovery matters

Mr. Wiseman:

This is our attempt to meet and confer regarding the following discovery issues:

1. Defendant Wang's refusal to produce any documents to RFP 20 and 21 regarding Wang's L-1 visa applications.

As we have stated before, these documents are very relevant to the issue of ownership of the computers and contents therein at issue. Nearly all the evidence relied upon by Defendants to claim their ownership of the computers are documents "created" for the purpose of supporting the L-1 petition, extension or appeal to the USCIS's decision to revoke the visa. Thus, we think Wang's stonewalling on this matter is inappropriate. Such documents may also be responsive to RFP 30 and 31.

1A. Related to point 1, we are communicating with Henry Hu regarding subpoena for Wang's immigration files related to Ruifeng's business. Hu says he needs Wang's consent. We will compel the response to the subpoena as well.

2. Defendants' failure to produce emails and texts in response to RFP 23, 26, 28, 20. Neither Alex Wong nor Alan were even asked to search for these documents. Defendants did not produce a single email among them.

3. Defendants' failure to produce its customer list (RFP 28)

4. Defendants' failure to produce any vendor related documents (RFP 23)

5. Renewed requests for inspection of computers. We don't find your search adequate. You cannot just holistically search documents. The search must be conducted produced using proper key words contained in the database information.

6. Request for an order to remedy Defendants' discovery abuses including improper deposition defense conducts and failure to properly search and produce documents.

We request a meet and confer as soon as possible, no later than 5 pm of Monday.



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 18

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 6/23/2021 5:09:40 PM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]; Ng, Tiffany F. [tng@buchalter.com]; Carr, Brandon M. [bcarr@buchalter.com]
CC: Smith, Amy [asmith@buchalter.com]; chenc@lilaw.us; Elam, Berit [belam@buchalter.com]
Subject: RE: W9 - RSM US LLP with Remit - Signed 01.06.2021.pdf

Jim

More bad faith tactics. You don't get to determine Ms. Sebold's rate. The fact that your office abandoned the deposition of Defendants' retained expert after 20 minutes, because you would have to invest in this baseless lawsuit and pay her \$610 rate, speaks volumes. *Flir Systems, Inc. v. Parrish*, 174 Cal.App.4th 1270, 1282 (2009) [manner in which plaintiff litigates trade secret claim is a factor considered for subjective bad faith].

Because its trade secret claim has no merit, rather than put down its sword, Quinrara has now put all its eggs in the royalties basket. An award of royalties by the court is a fallback if the jury cannot determine actual losses or unjust enrichment. The fact that Quintara desperately hopes to prove royalties, shows that it knows it cannot prove its actual losses or unjust enrichment. Also, just so you know, royalties are decided by the court, just like an injunction and they are legal issues.

We are bringing a motion to disqualify Mr. Kimura as an expert. Non-retained experts can only provide opinions about what they did in the regular scope of their job duties which is of an expert nature (i.e., treating physician, radiologist, etc.) Mr. Kimura repeatedly testified yesterday that none of his regular job duties involve calculating lost profits, determining unjust enrichment, calculating royalties, or determining if injunctions should be awarded. Instead of hiring and paying a qualified expert, your office handled this action on the cheap, and continues to pursue this action in bad faith.

Dylan Wiseman

T (415) 227-3506
 C (916) 212-6737

From: lij@lilaw.us <lij@lilaw.us>
Sent: Wednesday, June 23, 2021 9:44 AM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us
Subject: RE: W9 - RSM US LLP with Remit - Signed 01.06.2021.pdf

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

Rule 26 does not distinguish retained from non-retained expert when it states the reasonable compensation for deposition. Our deposition of Ms. Sebold lasted 20 minutes. We think a reasonable compensation for Ms. Sebold is \$400 an hour. So we will pay her \$133.33. Mr. Kimura's reasonable compensation is \$300 per hour, and your deposition of him lasted 8.5 hours. So please render a check to Mr. Kimura for \$2,550. Because you deposed Mr. Kimura first, we expect to receive your check before we dispense the check to Ms. Sebold.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Wednesday, June 23, 2021 8:56 AM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us
Subject: RE: W9 - RSM US LLP with Remit - Signed 01.06.2021.pdf

No chance. Mr. Kimura is not a retained expert. She demands payment.

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700
San Francisco, CA 94105-3493
www.buchalter.com | [Bio](#) | [LinkedIn](#)

From: lij@lilaw.us <lij@lilaw.us>
Sent: Wednesday, June 23, 2021 8:52 AM
To: Wiseman, Dylan W. <dwiseman@buchalter.com>; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>; chenc@lilaw.us
Subject: RE: W9 - RSM US LLP with Remit - Signed 01.06.2021.pdf

This message has originated from an **External Email**. lij@lilaw.us <lij@lilaw.us>:

Dylan,

In my past practice in federal courts, we mutually waive the payment for the experts. In fact, after nearly thirty years of litigation in federal courts, I have never know a case where the expert fees are expected. If you expect us to pay Ms. Sebold, we will expect you to pay Mr. Kimura. It's a hassle we can both avoid by waiving the fees mutually for the depositions.

Jim



J. James Li, Ph.D.

LiLaw Inc., 1905 Hamilton Ave., Suite 200, San Jose, CA
650.521.5956. www.lilaw.us.

From: Wiseman, Dylan W. <dwiseman@buchalter.com>
Sent: Tuesday, June 22, 2021 9:09 AM
To: lij@lilaw.us; Daniel Peterson <petersond@lilaw.us>
Cc: Smith, Amy <asmith@buchalter.com>
Subject: W9 - RSM US LLP with Remit - Signed 01.06.2021.pdf

Ms. Sebold's W9. Please prepare a check. Thank you,

Buchalter

Dylan W. Wiseman

Shareholder

T (415) 227-3506

dwiseman@buchalter.com

55 Second Street, Suite 1700

San Francisco, CA 94105-3493

www.buchalter.com | [Bio](#) | [LinkedIn](#)

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

Notice To Recipient: This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message and any and all duplicates of this message from your system. Thank you in advance for your cooperation. For additional policies governing this e-mail, please see <http://www.buchalter.com/about/firm-policies/>.

EXHIBIT 19

Message

From: Wiseman, Dylan W. [dwiseman@buchalter.com]
Sent: 7/8/2021 3:49:09 AM
To: lij@lilaw.us; Daniel Peterson [petersond@lilaw.us]; Richard Lambert [lambertr@lilaw.us]
CC: Carr, Brandon M. [bcarr@buchalter.com]; Ng, Tiffany F. [tng@buchalter.com]; Smith, Amy [asmith@buchalter.com]
Subject: Quintara v. Ruifeng
Attachments: Buch5267_Supplemental Reportv_RNovoa_Final-signed.pdf

Jim

Enclosed please find Rene Novoa's Supplemental Report.

As you can see from his findings, Defendants have grave concerns that your firm failed to preserve the Customer Profile Database and Vendor Database, never produced those records, and instead permitted Quintara to manufacture its own evidence identified in the 922 records "consisting of" Quintara's claimed trade secrets which were created after March 9, 2020.

We have consistently maintained that Quintara has pursued this action in bad faith and is prosecuting this action for an anti-competitive purpose. *Flir Systems, Inc. v. Parrish*, 174 Cal.App.4th 1270, 1281 (2009); *Swarmify, Inc. v. Cloudfare, Inc.*, Case No. C 17-06957 WHA, 2018 WL 4680177 (N.D. Cal. 2018); *Bladeroom Group LTD v. Emerson Electric Co.*, Case No. 5:15-cv-01370-EJD (Mar. 11, 2019).

We plan to raise these facts with Judge Alsup at the July 20th hearing regarding Defendants' terminating sanctions motion.

Rest assured, we will be presenting

Dylan W. Wiseman | Shareholder | [Buchalter](#), A Professional Corporation | 500 Capitol Mall, Suite 1900 |
Sacramento, CA 95814-4737 | Direct Dial: 916-945-5185 | Cell Phone: 916-212-6737 |
dwiseman@buchalter.com | www.buchalter.com | [Bio](#) | [LinkedIn](#)

Dylan Wiseman

T (415) 227-3506

C (916) 212-6737



Client: Buchalter

Client Contact: Dylan Wiseman

Matter: Quintara Biosciences Inc v Ruifeng Biztech Inc, Gangyou Wang, Alex Wong, Alan Li, Rui Shao and RF Biotech

Tools Used:

- FTK Imager 4.5.03
- FTK Imager 3.1.1
- File Locator 8.5
- Nuix eDiscovery
- Relativity

Expert Report of Rene Novoa

I, Rene Novoa, declare as follows: I am an adult over the age of eighteen (18) years of age. I have personal knowledge of the facts set forth in this report, and if called as a witness, could testify competently to those facts.

Credentials

I am currently employed at HaystackID, a company that specializes in eDiscovery and computer forensics that regularly works on complex, data-intensive investigations, and litigation.

I have more than 20 years of technology experience conducting data recovery, digital forensics, eDiscovery, and account management and sales activities. During this time, I have performed more than 180 investigations in both civil and criminal matters and have directly provided litigation support and forensic analysis for seven years. Additionally, I have worked with ICAC, HTCIA, IACIS and other regional tasks forces supporting State Law Enforcement Divisions and users in my most recent forensic leadership roles. I have obtained certifications in EnCase (Guidance Software), Access Data (FTK), PGP, Paraben Cell Phone Forensic, Cellebrite, Nuix, X1 Social Discovery, Blackbag, and Oxygen Detective.



Scope of Assignment

I am providing an updated and supplemental expert report to my May 15, 2021 report in response to the ongoing collection and preservation order for all Ruifeng Biztech computer systems located at 353 Investment Blvd #2, in Hayward, California, 94545. This case has evolved from searching selected computers for specific files to full preservation of all computer systems. In addition to previous collected computer devices that included, file listings and logical image, full physical images (bit for bit image) are being made of all available computer systems.

Further, I am writing to provide my opinions about the anticipated claims made by Jon Berryhill, Quintara's retained forensic expert. I am also providing my opinion about the lack of any meaningful preservation by Quintara of its Customer Profile Database or its Vendor Database as of the time the alleged misappropriation occurred. Defendants reserve the right to provide rebuttal opinions based on the supplemental report of Quintara's forensic expert, which will be presented at the upcoming deposition.

Identification and Collection of Devices

As stated in my May 2021 report, there were 17 identified computers/servers of which 6 had been forensically imaged. It was my understanding that the computers were fragile, and they were built custom for Ruifeng, to keep the business continuity going and preventing any disruption to day-to-day business, live logical images were created. This process allows for a forensic image to be created without shutting down a computer system or taking the hard drive out of the computer system. In April of 2021, the scope of the investigation was to identify the presence of a list of files that comprised of 922 base files. Based on the Magistrate Judge's ruling dated April 16, 2021, Quintara was to identify all of its alleged trade secrets on April 21, 2021, with the Defendants



to report back the search results showing the presence or absence of Quintara's identified files on April 23, 2021.

Between April 21, 2021, and June 18, 2021, I returned to Ruifeng Biztech several times to image the remaining 11 computer systems (listed below) using forensic software FTK imager 4.503. These computer systems that had not been previously acquired in February 2021. I understand that the computers used for the DNA sequencing process were not originally imaged because they are dedicated to the DNA sequencing process and contain information generated by the sequencers.

Computer Name	Serial Number
Wisconsin	WCAYUJT22352/WCAYUJT22850
Colorado	WMAYUL437651
WinXP	WCC2ELN85367
Custom Server	WMANM1484841/WD-WCAWFA7119838
Roxanne	WMAV21549541/ WMAV2FT71987
Tennessee	WCC2ELN06914
Virginia	WCAWF0093619/ WCAWFO111860
Vena	WMAYUL459731
Oregon	WCC2ELN85496
Hawaii	5H1H5MUG
Bengal	WCAVST5548909

HAYSTACK

The 11 computers (listed above) with the exception of the “Custom Server” are part of the DNA sequencing process that requires proprietary software and hardware to operate. At the time of collection, Wisconsin”, “Colorado” and “WinXp” were located under a desk and where not connected an any of the DNA sequencing machines. (See image below)



HAYSTACK

While onsite on June 18, 2021, an additional computer was located under a trash bin identified as “Auction Admin” SN: 5LRD5QPS.



The “Auction Admin” computer system was imaged and preserved.

Review of Devices for Identified Files

There were 17 images and a RFBio server ingested by our processing team that ran searches to identified any of the 922 base files. The processing team also performed additional searches across the 17 images to include two batches of files that comprised of 10,000 loose files, and 64 SQL files.

Computer/Server	922 Records	10,000 Records	64 SQL
Li	No	No	No
Workstation 2	No	No	No
Workstation 3	No	No	No
Wang	No	No	No
Wang	No	No	No
Tennessee	No	No	No
Bengal	No	No	No
Oregon	No	No	No
Vena	No	No	No
Roxanne	No	No	No
Hawaii	No	No	No



Virginia	No	No	No
NanoDrop	No	No	No
Wisconsin	No	No	No
Colorado	No	No	No
WinXP	No	No	No
Custom-Server	Yes	No	No
RFBio	Yes	No	No

From the items processed there were only two files that produced a match based on MD5 Hash search as stated in my previous report. The original files names were in the 922-records file list. (listed below)

Original File Name	Duplicate File Name	File Path
Decontamination form-email printout.pdf	2009_02_09_19_19_53.pdf	\Server_Custom\[File System Root]\Dane Crossley Alligator\Sue-USB\Quintara\Received_Payment\Alex
processed_orders_01-2021.xlsx	processed_orders.xlsx	\RFBio_Server\[File System Root]\Z\Lab material info sheet

Quintara then later added more searches seeking to review “ab1 files,” a “Custom Primer List,” a file called “Copy-Dec-Feb 2020 Customer list .xlsx,” and a second Excel spreadsheet.

They analyzed the two email files – “Ex 98 (Li Email)” and “EX 98A (attachment)” for any duplicates or near-duplicates across all sets of data. There were no hash duplicates of any of these identified files in any of the processed data sets.

They then ran near-duplicate detection at a 95% and 100% level across all data and searched for any near duplicates of these identified files. One file was found to be 100% text match for the file “Ex 98A(attachment).xlsx” file. That file is “Copy-Dec-Feb 2020 Customer list.xlsx” was in the



data path RFBio Server: Z:\Lab Material info sheet. The metadata for this file is listed below. The searches performed by the processing team are current to all images collected and processed before June 25, 2021.

Copy-Dec-Feb 2020 Customer list.xlsx	Meta- Data
File Accessed	2021-01-26T01:39:12.000Z
File Changed	2021-05-06T04:46:46.264Z
File Created	2020-06-04T22:55:23.000Z

File Name Search

The files listed below were identified as part of the “database” by Quintara after reviewing the collected image files but was not identified by Ruifeng search analysis. This result is due to the listed file are not part of either of the two search groups.

File Name	922 Records	10,000 Records
Copy-Dec-Feb 2020 Customer list .xlsx	No	No
Ab1 files	No	No
Customer “Primer” list	No	No

On June 28, 2021, I submitted my Declaration in Support of Defendants’ Motion for Summary Adjudication. I have no changes or edits to my Declaration, which I incorporate by this reference.

Quintara’s Anticipated Claims: Logical Image / Physical Imaging

Logical images allow searching the computer systems for all data that is present to the user at the time of collection. All logical images were created with the use of a forensic write-blocker, which prevents alteration of any of data files or its associated meta data at the time of collection. Logical images are store in forensic containers (E01, AD1) that do not allow for the data collected to be



manipulated or altered. At the time, the project was to determine the presence or absence of certain files, and logical imaging accomplishes that task.

The fact that there are now full physical images created of Ruifeng computer systems, does not change the process of how records are searched and identified. Physical images of the computer systems could allow for the carving and parsing of records that may have been deleted or partially overwritten. Any resulting data that may be recovered from the hard drives free space is not likely to have the associated metadata needed to report creation, modified dates or even location path of the file. In this case, full physical images are not required nor helpful to help identify the list of 922 records or the 10,000 records provided by Quintara.

It should be noted that at the time of this report, recollection of the remaining computer systems at Ruifeng are being performed. They will be preserved as full physical image files as requested by Quintara's legal team. An additional supplemental report may be required regarding additional collections due to collection challenges with "Workstation2" and "Nano Computer". The Workstation 2 is 2 TB and will take up to 6 hours to image physically.

Although physical images (Bit for Bit copies) were not acquired in the first series of collections, alternate methods were used to search for the existence of the Quintara identified base set of files. These alternate methods, file name searches, hash set, and near-duplication analysis were used for identification purposes that would support possession of data files belonging to Quintara after March 2020. There was no significant evidence of a repository of data files collected, stored, or used after the March 2020 date when Ruifeng separated from Quintarara.



Anticipating Quintara's Arguments: Missing Operating System

The computer system "Custom Server" SN: WMANM1484841/WD-WCAWFA7119838 was located under a desk in a corner. The computer system contained two hard drives serial numbers listed above and was covered in dust. There was no attempt to turn on or access the computer system as a live system. The hard drives were removed, imaged, processed and searched for evidence of the base 922 files and all additional added search criteria.



I am not aware of any other hard drive or the absence of one. The computer system was extremely dusty and did not appear to have been operational recently. The system did not contain an operating system but I am not aware of how the computer was originally set up or how it was previously being accessed.

Additional Findings: No Access to QB online and MySQL

After reading Xueling "Sue" Zhao declaration on April 20, 2021 and her statement in her deposition on April 13, 2021, it appears that she had absolute control of her own MySQL data storage and controlled permissions to allow access into a portal. QB Online was described as a proprietary program designed specifically for Ms Zhao and Quintara's business practice. I have no intimate knowledge of how the program works to fully describe its capabilities or limitations. As



I understand the QB Online portal was used to allow clients to log in and input data related to their contact information and research. Then based on user profiles set up by Ms Zhao, sales agents and Quintara employees could then log in and export reports about the data inputted. The QB Online program was used to gather and store information that could then be used to create business reports and generate business leads. She states that she is the only one in charge of access. She also states that the MySQL program does provide a log for 30 days identifying employees who accessed the database and when it was last logged into. I found no evidence on Defendants devices that they have QB Online or Quintara's MySQL database.

Additional Findings: Quintara's Failure to Preserve Key Evidence

As set forth in my Declaration in Support of Defendants' Terminating Sanctions Motion, which I incorporate by this reference, there was no effort to preserve the MySQL Customer Profile Database or Vendor Database in Ms. Zhao's possession or any of its logs. We are not able to corroborate any of Quintara's claims. Analysis on the system logs reporting access and exporting of information could have been available if proper preservation steps were taken at the time when misappropriation of data was suspected. I have no changes or edits to my Declaration in Support of the Terminating Sanctions Motion.

Although there has been a production of the 922 base records and an addition 10,000 records a year later (in March of 2021), no backup or preservation of the Customer Profile Database or Vendor Database has been produced for review. No logs have been produced of unauthorized access of Ruifeng employee accounts. Ms. Zhao testified there were some attempts to access the QB Online, but she cannot confirm that was by any of the defendants, and she acknowledges no access occurred. I have no changes or edits to my Declaration in Support of the Motion for Terminating Sanctions, which is incorporated herein by this reference.



Questionable File Lists.

The provided file names are a segment of the 922 records associated with the suspected misappropriated data provided by Quintara.. If files were created after March 2020, it raises the question of how this list was created and how it could be accessed by Ruifeng employees from the “Databases” which remained in Quintara’s possession and control, and Defendants lacked access to QB Online.

To my knowledge there are no preserved data sets of the database to authentic the origin of any of the suspected files from the 922 records or 10,000 records list. The 922 files, which were compiled in March of 2021, contain the following reaction reports for the months *after* the alleged March 2020 misappropriation.

	QB008095	CA_reactions_2020-4-01-2020-05-01.txt
	QB008096	CA_reactions_2020-5-01-2020-05-31.txt
	QB008097	CA_reactions_2020-6-01-2020-07-01.txt
	QB008098	CA_reactions_2020-7-01-2020-07-31.txt
	QB008099	CA_reactions_2020-8-01-2020-08-31.txt
	QB008100	CA_reactions_2020-9-01-2020-10-01.txt
	QB008115	CA_plates_2020-10-01-2020-10-31.txt
	QB008116	CA_plates_2020-1-01-2020-01-31.txt
	QB008117	CA_plates_2020-11-01-2020-12-01.txt
	QB008118	CA_plates_2020-12-01-2020-12-31.txt

HAYSTACK

QB008121	CA_plates_2020-4-01-2020-05-01.txt
QB008122	CA_plates_2020-5-01-2020-05-31.txt
QB008123	CA_plates_2020-6-01-2020-07-01.txt
QB008124	CA_plates_2020-7-01-2020-07-31.txt
QB008125	CA_plates_2020-8-01-2020-08-31.txt
QB008126	CA_plates_2020-9-01-2020-10-01.txt
QB008136	CA_techstat_2020-10-01-2020-10-31.txt
QB008137	CA_techstat_2020-1-01-2020-01-31.txt
QB008138	CA_techstat_2020-11-01-2020-12-01.txt
QB008139	CA_techstat_2020-12-01-2020-12-31.txt
QB008101	CA_reactions_2021-1-01-2021-01-31.txt
QB008102	CA_reactions_2021-2-01-2021-03-03.txt
QB008127	CA_plates_2021-1-01-2021-01-31.txt
QB008128	CA_plates_2021-2-01-2021-03-03.txt
QB008148	CA_techstat_2021-1-01-2021-01-31.txt
QB008149	CA_techstat_2021-2-01-2021-03-03.txt
QB008226	processed_orders_01-2021.xlsx

HAYSTACK

I declare under penalty of perjury under the laws of the United States and California that the foregoing is true and correct to the best of my knowledge.

Rene Novoa

Rene Novoa

Executed this 7 day of July, 2021 in the State of California, in the County of Sonoma.

REDACTED

EXHIBIT 20



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

August 31, 2020
Invoice No. 1032995

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	.00
Payments received through 09/09/20	.00
Previous Balance Remaining	.00
Current Fees Through 08/31/20	49,567.00
Invoice Total	\$ 49,567.00
Balance Due	\$ 49,567.00

Client Trust Balance 24,800.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles,
CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard
go to the payment portal on www.Buchalter.com

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/20 1032995 Page 1
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/04/20	TN	SPEAK WITH CLIENT [REDACTED]	.3	106.50
8/06/20	TN	SPEAK WITH CLIENT RE [REDACTED]	.7	248.50
8/07/20	TN	SPEAK WITH CLIENT RE [REDACTED]	.8	284.00
8/10/20	DWW	REVIEW/ANALYSIS OF COMPLAINT FOR RULE 12(B)(6) MOTION.	1.4	868.00
8/10/20	TN	SPEAK WITH CLIENT RE [REDACTED]	.3	106.50
8/11/20	DWW	REVIEW/REVISION OF PREPARE OUTLINE FOR COUNTER-CLAIM.	1.1	682.00
8/11/20	TN	SPEAK WITH CLIENT [REDACTED]	.2	71.00
8/12/20	TN	PREPARE FOR CONFERENCE CALL WITH CLIENT [REDACTED]	.8	284.00
8/13/20	DWW	REVIEW/ANALYSIS OF DOCUMENTS RECEIVED FROM CLIENT REGARDING [REDACTED]	2.1	1,302.00
8/14/20	DWW	REVIEW/ANALYSIS OF [REDACTED] FROM CLIENT; TELEPHONE CONFERENCES WITH T. NG.	.9	558.00
8/18/20	DWW	REVIEW/ANALYSIS OF EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION.	3.1	1,922.00
8/18/20	TN	FOLLOW UP AND CORRESPOND WITH CLIENT RE [REDACTED]	.3	106.50
8/19/20	BMC	CONFERENCE WITH D. WISEMAN REGARDING EX PARTE MOTION FOR TEMPORARY RESTRAINING ORDER; REVIEW/ANALYZE MOTION FOR TEMPORARY RESTRAINING ORDER, DECLARATION IN SUPPORT OF TEMPORARY RESTRAINING ORDER AND EXHIBITS; REVIEW/ANALYZE COMPLAINT; REVIEW ADMINISTRATIVE MOTION TO SEAL	2.3	1,242.00
8/19/20	DWW	REVIEW/ANALYSIS OF PLAINTIFF'S EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE REGARDING PRELIMINARY INJUNCTION; PREPARE OUTLINE AND BUDGET FOR OPPOSITION PAPERS.	4.2	2,604.00
8/19/20	TN	REVIEW EX PARTE APPLICATION WITH DECLARATION AND EXHIBITS; REVIEW CLIENT DOCUMENTS; [REDACTED] WITH CLIENT; PREPARE DECLARATION	5.7	2,023.50
8/20/20	BMC	REVIEW WANG DECLARATION; CONFERENCE CALL WITH D. WISEMAN AND MR. WANG REGARDING NEXT STEPS AND SETTLEMENT; REVIEW/ANALYZE MOTION TO SEAL DOCUMENTS; DRAFT OPPOSITION TO TEMPORARY RESTRAINING ORDER	1.5	810.00
8/20/20	DWW	REVIEW/REVISION OF RUIFENG; WANG DECLARATION; TELEPHONE CONFERENCE WITH MR. WANG, T. NG, AND B. CARR; PREPARE OUTLINE REGARDING OPPOSITION TO TRO APPLICATION.	5.2	3,224.00
8/20/20	TN	REVIEW CLIENT CORRESPONDENCE AND DOCUMENTS; PREPARE FOR AND PARTICIPATE IN CLIENT CONFERENCE CALL TO [REDACTED]	1.6	568.00
8/21/20	BMC	REVIEW ORDER SETTING HEARING ON MOTION FOR PRELIMINARY INJUNCTION; DRAFT DECLARATION REGARDING SERVICE OF COMPLAINT AND TEMPORARY RESTRAINING ORDER; DRAFT OPPOSITION TO TEMPORARY RESTRAINING ORDER	2.7	1,458.00
8/21/20	DWW	REVIEW/REVISION OF WANG DECLARATION AND TELEPHONE CONFERENCES		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	8/31/20 1032995 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/21/20	TN	WITH T. NG REGARDING TIMING OF OPPOSITION TO MOTION; REVIEW COURT ORDER REGARDING BRIEFING SCHEDULE AND HEARING DATE; REVIEW AND EDIT WISEMAN DECLARATION REGARDING SERVICE ACCEPTED FOR DEFENDANTS.	2.4	1,488.00
8/22/20	TN	REVIEW COURT ORDER AND ADDITIONAL CLIENT CORRESPONDENCE WITH DOCUMENTS; CORRESPOND WITH CLIENT RE [REDACTED]	.6	213.00
8/24/20	BMC	REVIEW ADDITIONAL CLIENT DOCUMENTS; FURTHER REVISE DECLARATION; COMPILE EXHIBITS TO THE DECLARATION; REACH OUT TO LANDLORD FOR [REDACTED]	3.3	1,171.50
8/24/20	DWW	DRAFT/REVISE OPPOSITION TO TEMPORARY RESTRAINING ORDER; REVIEW PLAINTIFF'S DECLARATIONS IN SUPPORT OF TEMPORARY RESTRAINING ORDER; RESEARCH REGARDING [REDACTED]	2.5	1,350.00
8/24/20	TN	REVIEW/REVISION OF WANG DECLARATION; EMPLOYEE DECLARATIONS; OPPOSITION BRIEF TO EX PARTE APPLICATION FOR ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION AND FOR A TRO.	5.8	3,596.00
8/24/20	TN	CONFERENCE CALL WITH EMPLOYEES TO [REDACTED]; FURTHER REVISE MR. WANG'S DECLARATION; CORRESPOND WITH LANDLORD	1.9	674.50
8/25/20	BMC	PREPARE EMPLOYEE DECLARATIONS AND EXHIBITS; CORRESPOND WITH EMPLOYEES	1.8	639.00
8/25/20	DWW	DRAFT OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING ORDER; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; RESEARCH [REDACTED]	2.0	1,080.00
8/25/20	TN	REVIEW/ANALYSIS OF WANG DECLARATION; MEETING WITH MR. WANG AT SACRAMENTO OFFICE; REVISE AND EDIT WANG DECLARATION; TELEPHONE CONFERENCES WITH T. NG AND B. CARR REGARDING OPPOSITION TO TRO/INJUNCTION.	6.2	3,844.00
8/25/20	TN	SPEAK WITH CLIENT OVER THE PHONE; REVIEW CORRESPONDENCE FROM CLIENT AND LITIGATION TEAM	.5	177.50
8/26/20	BMC	CONFERENCE CALL WITH CLIENT [REDACTED]	2.8	994.00
8/26/20	DWW	REVIEW/ANALYZE MOTION FOR TEMPORARY RESTRAINING ORDER AND AUTHORITIES; DRAFT/REVISE OPPOSITION; COMMUNICATIONS WITH D. WISEMAN AND T. NG REGARDING OPPOSITION	.8	432.00
8/26/20	TN	REVIEW/REVISION OF EDIT WANG DECLARATION AND OPPOSITION TO TRO/INJUNCTION; MULTIPLE TELEPHONE CALLS WITH T. NG AND B. CARR; REVIEW COMPLAINT REGARDING FEASIBILITY OF RULE 12(B)(6) MOTION.	4.1	2,542.00
8/27/20	BMC	REVISE CLIENT DECLARATION AND EXHIBITS; CORRESPOND WITH CLIENT; REVIEW ADDITIONAL DOCUMENTS; CORRESPOND WITH EMPLOYEES REGARDING DECLARATION; CORRESPOND WITH TRANSLATOR RE TRANSLATION ACCURACY; CORRESPOND WITH LANDLORD	2.9	1,029.50
8/27/20	DWW	DRAFT OPPOSITION TO TEMPORARY RESTRAINING ORDER; COMMUNICATIONS WITH D. WISEMAN REGARDING 12B6	1.3	702.00
8/27/20	TN	REVIEW/REVISION OF OPPOSITION TO TRO; PREPARE OUTLINE TO RULE 12(B)(6) MOTION; REVIEW EMPLOYEE DECLARATIONS; TELEPHONE CONFERENCES WITH T. NG REGARDING STATUS AND TRANSLATED EXHIBITS.	3.6	2,232.00
8/27/20	TN	SPEAK WITH LANDLORD REGARDING QUINTARA'S LEASE TERMINATION; WORK ON DECLARATION; REVIEW DOCUMENTS FROM CLIENT; CORRESPOND WITH CLIENT AND EMPLOYEES	2.1	745.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 8/31/20 1032995 3 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
8/28/20	DWW	REVIEW/ANALYSIS OF WANG DECLARATION; TRANSLATED EXHIBITS; RULE 12(B)(6) OUTLINE; TELEPHONE CONFERENCES WITH T. NG REGARDING SAME; REVISE AND EDIT MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION.	3.1	1,922.00
8/28/20	TN	FURTHER REVISE CLIENT DECLARATION; CORRESPOND WITH CLIENT TO [REDACTED]	1.8	639.00
8/29/20	TN	REVISE FACTS SECTION OF OPPOSITION TO TEMPORARY RESTRAINING ORDER MOTION	.5	177.50
8/30/20	ANJ	REVIEW, ORGANIZE AND REDACT DOCUMENTS IN PREPARATION FOR MOTION FILING	1.4	210.00
8/30/20	TN	FURTHER REVISE OPPOSITION TO TEMPORARY RESTRAINING ORDER MOTION AND ALL OTHER SUPPORTING DOCUMENTS; REVIEW CORRESPONDENCE FROM CLIENT	2.8	994.00
8/31/20	BMC	REVIEW/ANALYZE FRAUD CLAIM IN COMPLAINT; COMMUNICATIONS WITH D. WISEMAN REGARDING 12B6 TO FRAUD CLAIM; RESEARCH REGARDING ASSERTING [REDACTED]	.9	486.00
8/31/20	ANJ	FINALIZE REDACTED EXHIBITS.	.9	135.00
8/31/20	DWW	REVIEW/ANALYSIS OF MEMORANDUM OF POINTS AND AUTHORITIES, WISEMAN DECLARATION AND WANG DECLARATION; REVIEW AND EDIT DAMAGES SPREADSHEET; MULTIPLE TELEPHONE CALLS WITH T. NG; REVIEW AND EDIT EVIDENTIARY OBJECTIONS.	4.3	2,666.00
8/31/20	TN	DISCUSS FACTUAL DETAILS WITH CLIENT OVER THE PHONE; CORRESPOND WITH TRANSLATOR RE TRANSLATION ISSUES; PREPARE LITIGATION HOLD MEMO; CORRESPOND WITH CLIENT OVER EMAIL RE BUSINESS INSURANCE, LITIGATION HOLD, AND DAMAGE CALCULATIONS	1.6	568.00
8/31/20	TN	PREPARE EVIDENTIARY OBJECTIONS TO SHAN DECLARATION	1.1	390.50

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	14.0	540.00	7,560.00
ANTOINETTE N. JOHNSON	2.3	150.00	345.00
DYLAN WISEMAN	47.5	620.00	29,450.00
TIFFANY NG	34.4	355.00	12,212.00
Total	98.2		49,567.00

Total Fees 49,567.00
Matter Total \$ 49,567.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

September 30, 2020
Invoice No. 1037293

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	49,567.00
Payments received through 10/06/20	29,400.00-
Previous Balance Remaining	20,167.00
Current Fees Through 09/30/20	43,285.50
Invoice Total	\$ 43,285.50
Balance Due	\$ 63,452.50

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard
go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
20,167.00	.00	.00	63,452.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	9/30/20 1037293 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
9/01/20	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING 12B6 MOTION; RESEARCH [REDACTED]	.6	324.00
9/01/20	ANJ	FURTHER REVIEW OF DOCUMENTS AND FURTHER REDACTIONS; FORWARD EXHIBITS TO COUNSEL IN PREPARATION FOR FILING.	1.6	240.00
9/01/20	DWW	REVIEW/REVISION OF TO MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF OPPOSITION TO TRO/OSC RE: PRELIMINARY INJUNCTION, WANG DECLARATION, EVIDENTIARY OBJECTIONS.	5.1	3,162.00
9/01/20	KB	PROOFREAD DEFENDANT'S OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION FOR ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER, DECLARATIONS OF DYLAN WISEMAN AND GANGYOU WANG IN SUPPORT.	1.6	104.00
9/01/20	TN	PREPARE DECLARATION FOR THE LANDLORD; SPEAK WITH CLIENT OVER THE PHONE; FINAL EDITS TO DECLARATIONS; REVIEW EXHIBIT REDACTIONS; MANAGE TRANSLATION; FINALIZE OPPOSITION FOR FILING	4.2	1,491.00
9/01/20	TN	WORK ON MOTION TO DISMISS	2.2	781.00
9/02/20	DWW	CORRESPONDENCE WITH G. WANG REGARDING [REDACTED].	.3	186.00
9/02/20	TN	CONTINUE TO WORK ON MOTION TO DISMISS	4.9	1,739.50
9/03/20	DWW	REVIEW/REVISION OF MOTION TO DISMISS FRAUD CLAIM, DTSA ATTORNEYS' FEES AND EXEMPLARY DAMAGES, AND UNFAIR COMPETITION CLAIM	5.1	3,162.00
9/03/20	TN	PREPARE SUPPORTING DOCUMENTS FOR MOTION TO DISMISS INCLUDING NOTICE, REQUEST FOR JUDICIAL NOTICE, AND PROPOSED ORDER	1.4	497.00
9/04/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO DISMISS; REVISE AND EDIT NOTICE OF MOTION AND REQUESTS FOR ADMISSION; TELEPHONE CONFERENCES WITH T. NG REGARDING MOTION TO DISMISS ARGUMENTS.	4.7	2,914.00
9/04/20	TN	FURTHER REVISE MOTION TO DISMISS	1.9	674.50
9/07/20	DWW	REVIEW/REVISION OF RULE 12(B)(6) MOTION REGARDING EXCEPTION TO STATUTE OF FRAUDS.	.8	496.00
9/07/20	KB	PROOFREAD DEFENDANT'S MOTION TO DISMISS.	.9	58.50
9/08/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO DISMISS; REVISE AND EDIT NOTICE OF MOTION; REQUEST FOR JUDICIAL NOTICE; AND PROPOSED ORDER.	5.1	3,162.00
9/08/20	TN	FINALIZE MOTION TO DISMISS FOR FILING; IDENTIFY NEXT STEPS IN LITIGATION; REACH OUT TO OPPOSING COUNSEL RE STIPULATION	.6	213.00
9/09/20	BMC	REVIEW ORDER DENYING PRELIMINARY INJUNCTION	.2	108.00
9/09/20	DWW	REVIEW/ANALYSIS OF WANG DECLARATION AND OUTLINE FOR DISCOVERY PLAN; REVIEW ORDER DENYING PRELIMINARY INJUNCTION; CORRESPONDENCE WITH MR. WANG [REDACTED]; BEGIN TO PREPARE CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING RECORDS DEMAND.	2.8	1,736.00
9/09/20	TN	REVIEW CLIENT CORRESPONDENCE [REDACTED] CALCULATIONS; ANSWER QUESTIONS FROM THE CLIENT OVER THE PHONE; REVIEW ORDER DENYING PRELIMINARY INJUNCTION	1.2	426.00
9/09/20	TN	PREPARE PROTECTIVE ORDER WITH CUSTOM DESIGNATIONS	.8	284.00
9/10/20	DWW	REVIEW/REVISION OF CORRESPONDENCE TO COUNSEL FOR PLAINTIFF REGARDING RECORDS DEMAND; CORRESPONDENCE WITH MR. WANG REGARDING [REDACTED]; REVISE AND EDIT		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	9/30/20 1037293 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
9/10/20	TN	STIPULATED PROTECTIVE ORDER; CORRESPONDENCE WITH COUNSEL FOR PLAINTIFF REGARDING REVISIONS TO PROTECTIVE ORDER.	3.4	2,108.00
		REVIEW CORRESPONDENCE FROM CLIENT [REDACTED]; FOLLOW UP WITH OPPOSING COUNSEL RE PROTECTIVE ORDER; IDENTIFY NEXT STEPS IN LITIGATION	.1	35.50
9/11/20	DWW	REVIEW/ANALYSIS OF FINAL EDITS TO STIPULATED PROTECTIVE ORDER; REVIEW AND RESEARCH [REDACTED]	2.4	1,488.00
9/11/20	TN	REVIEW CORRESPONDENCE FROM CLIENT; REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL; FURTHER REVISE PROTECTIVE ORDER	.2	71.00
9/14/20	TN	REVIEW CORRESPONDENCE FROM CLIENT AND OPPOSING COUNSEL	.4	142.00
9/15/20	BMC	REVIEW DOCKET AND STANDING ORDERS REGARDING RULE 26 DISCLOSURES AND CASE MANAGEMENT STATEMENTS; COMMUNICATIONS WITH T. NG REGARDING UPCOMING DEADLINES AND DISCLOSURES	.6	324.00
9/15/20	TN	CORRESPOND WITH CLIENT RE [REDACTED]; REVIEW CLIENT AND OPPOSING COUNSEL CORRESPONDENCE; IDENTIFY NEXT STEPS IN LITIGATION	.4	142.00
9/16/20	DWW	REVIEW/REVISION OF DOCKET AND PREPARE FOR RULE 26(F) CONFERENCE FOR FRIDAY, SEPTEMBER 18, 2020.	1.1	682.00
9/16/20	TN	OBTAIN CORPORATE INFORMATION FOR PURPOSES OF CERTIFICATE OF INTERESTED PARTIES	.3	106.50
9/17/20	BMC	REVIEW ORDER DENYING MOTION TO SEAL AND GRANTING STIPULATED PROTECTIVE ORDER WITH CONDITIONS	.2	108.00
9/17/20	DWW	PREPARATION FOR RULE 26(F) CONFERENCE; EMAILS WITH G. WANG REGARDING [REDACTED]; TELEPHONE CONFERENCE WITH T. NG REGARDING PROTECTIVE ORDER AND INITIAL DISCLOSURES.	1.1	682.00
9/17/20	TN	[REDACTED] FROM THE CLIENT; IDENTIFY NEXT STEPS IN LITIGATION; REVIEW COURT ORDER	.8	284.00
9/18/20	DWW	PREPARATION FOR AND PARTICIPATE IN RULE 26 CONFERENCE WITH COUNSEL FOR QUINTARA.	1.2	744.00
9/18/20	TN	PARTICIPATE IN RULE 26(F) CONFERENCE WITH OPPOSING COUNSEL; IDENTIFY NEXT STEPS IN LITIGATION; FOLLOW UP WITH LANDLORD FOR MORE INFORMATION; FURTHER REVIEW CORPORATE DOCUMENTS RELATED TO COMPANY OWNERSHIP	.9	319.50
9/20/20	TN	REVIEW CLIENT [REDACTED]	.2	71.00
9/21/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM MR. WANG REGARDING [REDACTED]	.2	124.00
9/22/20	DWW	PREPARATION OF CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING COMPLIANCE WITH CALIFORNIA CODE OF CIVIL PROCEDURE SECTION 2019.210 IN THE NORTHERN DISTRICT; REVIEW CASES REGARDING SAME; TELEPHONE CONFERENCE WITH T. NG REGARDING STATUS.	4.7	2,914.00
9/22/20	TN	REVIEW CLIENT [REDACTED]; REVIEW LOCAL RULES RE INITIAL DISCLOSURES; IDENTIFY NEXT STEPS IN LEGAL STRATEGY; PREPARE CERTIFICATE OF INTERESTED PARTIES	1.2	426.00
9/22/20	TN	PARTICIPATE IN CLIENT CONFERENCE CALL	.7	248.50
9/22/20	TN	REVIEW PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS; EVALUATE AUTHORITIES IN FRAMING LEGAL ARGUMENT FOR THE REPLY	2.0	710.00
9/23/20	BMC	REVIEW/ANALYZE OPPOSITION TO 12B6 MOTION; REVIEW CACI INSTRUCTION		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 9/30/20 1037293 3 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
9/23/20	DWW	REGARDING [REDACTED] REVIEW/ANALYSIS OF QUINTARA'S OPPOSITION TO MOTION TO DISMISS; PREPARE OUTLINE TO T. NG REGARDING ARGUMENT STRUCTURE AND ORGANIZATION.	.8 3.1	432.00 1,922.00
9/23/20	KP	EMAIL CORRESPONDENCE WITH T. NG RE CLIENT DATA COLLECTIONS ESTIMATE.	.7	122.50
9/23/20	TN	EVALUATE FORENSIC DOCUMENT COLLECTION PROCEDURES; REVIEW CORRESPONDENCE AND DOCUMENTS FROM CLIENT	.3	106.50
9/24/20	DWW	REVIEW/REVISION OF REPLY BRIEF TO MOTION TO DISMISS.	1.8	1,116.00
9/24/20	TN	WRITE REPLY IN SUPPORT OF MOTION TO DISMISS	5.4	1,917.00
9/28/20	DWW	REVIEW/REVISION OF REPLY BRIEF TO RULE 12(B)(6) MOTION.	1.7	1,054.00
9/28/20	KB	PROOFREAD DEFENDANT'S REPLY IN SUPPORT OF MOTION TO DISMISS.	.5	32.50
9/28/20	TN	CORRESPOND WITH CLIENT [REDACTED]; REVIEW REPLY TO MOTION TO DISMISS	.5	177.50
9/29/20	TN	IDENTIFY NEXT STEPS IN LITIGATION; REVIEW PLAINTIFF'S TRADE SECRET DISCLOSURE	.3	106.50
9/30/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S CODE OF CIVIL PROCEDURE SECTION 2019.210 STATEMENT; TELEPHONE CONFERENCE WITH T. NG REGARDING MOTION FOR PROTECTIVE ORDER; BEGIN TO PREPARE CORRESPONDENCE REGARDING DEFECTS IN QUINTARA'S CCP 2019.210 STATEMENT.	2.3	1,426.00
9/30/20	TN	REVIEW AND RESPOND TO CLIENT CORRESPONDENCE; REVIEW AUTHORITIES RELATED TO SECTION 2019.210; PREPARE MOTION FOR PROTECTIVE ORDER	3.9	1,384.50

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	2.4	540.00	1,296.00
ANTOINETTE N. JOHNSON	1.6	150.00	240.00
DYLAN WISEMAN	46.9	620.00	29,078.00
KARYN BALZARY	3.0	65.00	195.00
KEVIN PARKER	.7	175.00	122.50
TIFFANY NG	34.8	355.00	12,354.00
Total	89.4		43,285.50

Total Fees 43,285.50
Matter Total \$ 43,285.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

October 31, 2020
Invoice No. 1042863

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	63,452.50
Payments received through 11/09/20	14,700.00-
Previous Balance Remaining	48,752.50
Current Fees Through 10/31/20	77,478.00
Current Disbursements Through 10/31/20	1,266.07
Invoice Total	\$ 78,744.07
Balance Due	\$ 127,496.57

Client Trust Balance 44,400.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
43,285.50	5,467.00	.00	127,496.57

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/20 1042863 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/01/20	DWW	PREPARATION OF MEET AND CONFER LETTER REGARDING QUINTANA'S FAILURE TO COMPLY WITH CCP 2019.210; PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH G. WANG REGARDING [REDACTED]; REVIEW AND RESPOND TO EMAIL FROM OPPOSING COUNSEL REGARDING EARLY NEUTRAL ASSESSMENT FOLLOWED BY MEDIATION.	5.1	3,162.00
10/01/20	TN	REVIEW CORRESPONDENCE FROM PLAINTIFF; PARTICIPATE IN CONFERENCE CALL WITH CLIENT; CORRESPOND WITH CLIENT	1.5	532.50
10/02/20	DWW	PREPARATION OF OUTLINE FOR MOTION FOR PROTECTIVE ORDER UNDER CODE OF CIVIL PROCEDURE SECTION 2019.210.	1.7	1,054.00
10/05/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S RESPONSE TO CCP 2019.210 MEET AND CONFER LETTER.	.6	372.00
10/06/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING REFUSAL TO AMEND CCP 2019.210 STATEMENT; REVIEW RECENT FEDERAL CASES; PREPARE RESPONSE; CORRESPONDENCE WITH M. LI REGARDING [REDACTED].	2.8	1,736.00
10/07/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM COUNSEL FOR QUINTARA DECLINING TO AMEND CCP 2019.210 STATEMENT; BEGIN OUTLINE FOR EXPERT AND SALES PERSONNEL REGARDING QUINTARA'S CCP 2019.210 STATEMENT; CORRESPONDENCE WITH MR. WANG REGARDING [REDACTED]. BEGIN TO PREPARE DECLARATION.	3.2	1,984.00
10/07/20	TN	REVIEW CLIENT CORRESPONDENCE RE [REDACTED]	.1	35.50
10/08/20	BMC	REVIEW/ANALYZE QUINTARA'S TRADE SECRET DISCLOSURE; REVIEW DOCKET AND UPCOMING PRE-TRIAL DEADLINES; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	.5	270.00
10/08/20	DWW	REVIEW MATERIALS FROM G. WANG TO PREPARE [REDACTED] DR. ZHAO; CONFERENCE CALL WITH DR. ZHAO; MULTIPLE EMAIL CORRESPONDENCES WITH MR. WANG REGARDING [REDACTED]; PREPARE, REVISE AND EDIT DR. ZHAO'S DECLARATION IN SUPPORT OF MOTION FOR PROTECTIVE ORDER UNDER CCP 2019.210.	4.1	2,542.00
10/09/20	BMC	REVIEW/ANALYZE LOCAL RULES AND JUDGE'S STANDING ORDERS REGARDING JOINT CASE MANAGEMENT STATEMENT AND RULE 26 INITIAL DISCLOSURES; COMMUNICATIONS WITH D. WISEMAN REGARDING PREPARATION OF RULE 26 DISCLOSURES AND JOINT CASE MANAGEMENT STATEMENT	1.2	648.00
10/09/20	BMC	DRAFT RULE 26 INITIAL DISCLOSURES; REVIEW/COMPILE DOCUMENTS AND WITNESS INFORMATION FOR DISCLOSURES	2.7	1,458.00
10/09/20	BMC	DRAFT JOINT CASE MANAGEMENT CONFERENCE STATEMENT; MEET AND CONFER WITH D. PETERSON REGARDING JOINT CASE MANAGEMENT STATEMENT	2.4	1,296.00
10/09/20	ANJ	REVIEW AND ANALYZE DECLARATIONS; DRAFT INITIAL DISCLOSURE SECTION RELATING TO DOCUMENT DISCLOSURE.	1.4	210.00
10/09/20	DWW	CORRESPONDENCE WITH WITH MR. WANG; TELEPHONE CONFERENCE WITH B. CARR REGARDING RULE 26 INITIAL DISCLOSURES; REVISE AND EDIT ZHAO DECLARATION.	2.8	1,736.00
10/12/20	BMC	DRAFT/REVISE JOINT CASE MANAGEMENT STATEMENT; RESEARCH [REDACTED]; DRAFT/REVISE RULE 26 INITIAL DISCLOSURES; COMMUNICATIONS WITH D. PATTERSON REGARDING JOINT CASE MANAGEMENT STATEMENT; COMMUNICATIONS WITH D.		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/20 1042863 Page 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/12/20	ANJ	WISEMAN REGARDING SAME; REVIEW NORTHERN DISTRICT CASE MANAGEMENT ORDER; REVIEW/ANALYZE OPPOSITION TO MOTION TO DISMISS	4.9	2,646.00
10/12/20	DWW	FINALIZE DRAFT RULE 26 DISCLOSURE SECTION RELATING TO DOCUMENT IDENTIFICATION.	.6	90.00
10/12/20	DWW	REVIEW/ANALYSIS OF EMAIL FROM G. WANG REGARDING CRISPR-CAS9 TECHNOLOGY.	.2	124.00
10/13/20	DWW	PREPARATION OF DECLARATION OF D. ZHAO IN SUPPORT OF MOTION FOR PROTECTIVE ORDER.	2.1	1,302.00
10/13/20	TN	CORRESPOND WITH CLIENT RE [REDACTED] CONTINUE TO WORK ON MOTION FOR PROTECTIVE ORDER	2.9	1,029.50
10/14/20	BMC	REVISE/FINALIZE JOINT CASE MANAGEMENT STATEMENT AND INITIAL DISCLOSURES; COMMUNICATIONS WITH D. PETERSON REGARDING JOINT DISCLOSURES REVISED DRAFT; REVIEW FRCP AND LOCAL RULES REGARDING FILING INITIAL DISCLOSURES; REVIEW EDITS FROM D. WISEMAN TO JOINT STATEMENT; REVIEW RULES REGARDING TRIAL SETTING AND DISCOVERY CUTOFF FOR JOINT STATEMENT	2.8	1,512.00
10/14/20	DWW	PREPARATION OF DECLARATION OF A. LEE IN SUPPORT OF MOTION FOR PROTECTIVE ORDER.	2.1	1,302.00
10/14/20	DWW	REVIEW/REVISION OF DEFENDANTS' RULE 26 INITIAL DISCLOSURES.	.7	434.00
10/14/20	DWW	PREPARATION FOR AND TELEPHONE CONFERENCE WITH A. LEE REGARDING [REDACTED].	.8	496.00
10/15/20	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING COUNTERCLAIM; RESEARCH [REDACTED] REVIEW REVISED JOINT CASE MANAGEMENT STATEMENT; COMMUNICATION WITH J. LI REGARDING PLAINTIFF'S REVISIONS; REVIEW/ANALYZE PLAINTIFF'S INITIAL DISCLOSURES	2.9	1,566.00
10/15/20	DWW	REVIEW/REVISION OF LI DECLARATION AND CONTINUE TO PREPARE DR. ZHAO DECLARATION; REVIEW AND EDIT RULE 26 INITIAL DISCLOSURES AND JOINT CASE CONFERENCE REPORT.	5.2	3,224.00
10/15/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S EDITS TO JOINT CMC STATEMENT; EMAILS TO B. CARR REGARDING EDITS.	.3	186.00
10/15/20	KB	PROOFREAD DECLARATION OF ALAN LI.	.5	32.50
10/15/20	TN	REVIEW CLIENT AND PLAINTIFF CORRESPONDENCE AND INITIAL DISCLOSURES	.5	177.50
10/16/20	BMC	REVIEW/ANALYZE CASE MANAGEMENT ORDER; REVIEW/ANALYZE 12B(6) ORDER GRANTING MOTION; REVIEW CLERK'S NOTICE VACATING INITIAL CASE MANAGEMENT CONFERENCE; RESEARCH [REDACTED]	1.9	1,026.00
10/16/20	DWW	PREPARATION OF ZHAO DECLARATION; TELEPHONE CONFERENCE WITH DR. ZHAO; MULTIPLE EMAIL MESSAGES TO/FROM MR. WANG; REVISE AND EDIT LI DECLARATION; REVIEW RULING REGARDING MOTION TO DISMISS; PREPARE UPDATE TO MR. WANG.	3.1	1,922.00
10/16/20	TN	REVIEW COURT ORDERS AND CLIENT CORRESPONDENCE RE NEXT STEPS	.5	177.50
10/19/20	BMC	RESEARCH AND [REDACTED]	4.5	2,430.00
10/19/20	DWW	REVIEW/ANALYSIS OF CAUSES OF ACTION FOR COUNTER-CLAIM; PREPARE,		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/20 1042863 3	
Date	Tkpr	Description of Services Rendered	Page	Amount
10/19/20	TN	REVISE AND EDIT ZHAO DECLARATION	4.7	2,914.00
		REVIEW CLIENT CORRESPONDENCE; PARTICIPATE IN CONFERENCE CALL TO [REDACTED]	1.3	461.50
10/20/20	DWW	PREPARATION OF WANG DECLARATION; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PROTECTIVE ORDER; LI DECLARATION; REVISE AND EDIT WANG DECLARATION; REVISE AND EDIT DR. ZHAO DECLARATION.	6.2	3,844.00
10/20/20	TN	FURTHER REVISE MOTION FOR PROTECTIVE ORDER	4.4	1,562.00
10/21/20	BMC	DRAFT CROSS-COMPLAINT; DRAFT MEET AND CONFER ON PLAINTIFF'S INITIAL DISCLOSURES; ANALYZE POTENTIAL CLAIMS AGAINST QUINTARA	4.5	2,430.00
10/21/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PROTECTIVE ORDER; REVISE AND EDIT DR. ZHAO DECLARATION; TELEPHONE CONFERENCE WITH DR. ZHAO REGARDING [REDACTED]	4.3	2,666.00
10/21/20	TN	CORRESPOND WITH CLIENT RE [REDACTED]	.2	71.00
10/22/20	BMC	RESEARCH [REDACTED]; DRAFT COUNTERCLAIM; COMMUNICATIONS WITH D. WISEMAN REGARDING COUNTERCLAIM AND INITIAL DISCLOSURES MEET AND CONFER	4.7	2,538.00
10/22/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PROTECTIVE ORDER; PREPARE AND EDIT WANG DECLARATION; WISEMAN DECLARATION; LI DECLARATION AND ZHAO DECLARATION; PREPARE, REVISE AND EDIT PROPOSED ORDER; INITIAL REVIEW OF COUNTER-CLAIM; MULTIPLE EMAIL MESSAGES TO T. NG REGARDING STATUS.	5.7	3,534.00
10/22/20	TN	FURTHER REVISE MOTION FOR PROTECTIVE ORDER AND SUPPORTING DECLARATIONS	3.8	1,349.00
10/23/20	DWW	REVIEW/REVISION OF AND FINAL REVISIONS AND EDITS TO WANG DECLARATION, LI DECLARATION, MEMORANDUM OF POINTS AND AUTHORITIES, DR. ZHAO DECLARATION; REVISE AND EDIT COUNTER-CLAIM AND PREPARE EMAIL TO B. CARR REGARDING ADDITIONAL ALLEGATIONS; REVISE AND EDIT MEET AND CONFER LETTER TO COUNSEL FOR QUINTARA FOR ITS DEFICIENT RULE 26 DISCLOSURE.	4.6	2,852.00
10/23/20	KB	PROOFREAD NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER PENDING PLAINTIFF'S IDENTIFICATION OF ITS ALLEGEDLY MISAPPROPRIATED TRADE SECRET, MEMO OF P&AS.	1.8	117.00
10/23/20	TN	REVIEW COUNTERCLAIMS; CORRESPOND WITH CLIENT [REDACTED]	.8	284.00
		[REDACTED] REVIEW CLIENT CORRESPONDENCE	.7	248.50
10/24/20	TN	SPEAK WITH CLIENT RE [REDACTED]		
10/26/20	BMC	DRAFT/REVISE MEET AND CONFER LETTER ON INITIAL DISCLOSURES; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; COMMUNICATIONS WITH T. NG REGARDING ADDITIONS TO COUNTERCLAIM; DRAFT/REVISE COUNTERCLAIM; RESEARCH REGARDING [REDACTED] AND ABILITY TO BRING [REDACTED] CLAIM FOR JOINT VENTURE	2.8	1,512.00
10/26/20	DWW	REVIEW/ANALYSIS OF LI DECLARATION; FINAL EDITS TO WANG DECLARATION; CORRESPONDENCE WITH DR. ZHAO; REVIEW, REVISE AND EDIT MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PROTECTIVE ORDER; REVISE AND EDIT MEET AND CONFER LETTER TO COUNSEL FOR QUINTARA REGARDING DEFICIENT RULE 26 DISCLOSURES.	3.4	2,108.00
10/26/20	TN	REVISE COUNTERCLAIM BASED ON ADDITIONAL FACTS; CONSIDER LEGAL		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/20 1042863 Page 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
		STRATEGIES BASED ON ADDITIONAL FACTS; REVIEW CORRESPONDENCE FROM CLIENT	1.1	390.50
10/26/20	TN	[REDACTED] FROM THE CLIENT	3.2	1,136.00
10/27/20	BMC	RESEARCH [REDACTED]; DRAFT/REVISE CROSS-COMPLAINT AND ADD DISSOLUTION OF JOINT VENTURE CLAIM; REVIEW CASE MANAGEMENT ORDER REGARDING INITIAL DISCLOSURES	1.3	702.00
10/27/20	DWW	REVIEW/REVISION OF MOTION FOR PROTECTIVE ORDER, DR. ZHAO DECLARATION, LI DECLARATION, WISEMAN DECLARATION, PROPOSED ORDER.	4.7	2,914.00
10/27/20	TN	PREPARE DECLARATION TO SUPPORT MOTION FOR PROTECTIVE ORDER; REVISE MOTION FOR PROTECTIVE ORDER; REVIEW CLIENT CORRESPONDENCE	.8	284.00
10/28/20	BMC	REVIEW/ANALYZE MOTION TO AMEND CASE SCHEDULE	.4	216.00
10/28/20	DWW	REVIEW/REVISION OF MOTION FOR PROTECTIVE ORDER; ZHAO DECLARATION; WANG DECLARATION; PROPOSED ORDER; REVIEW AND EDIT LI DECLARATION.	4.7	2,914.00
10/28/20	TN	REVIEW CORRESPONDENCE RELATED TO MOTION FOR PROTECTIVE ORDER, FACTS OF THE CASE, AND SETTLEMENT	.3	106.50
10/29/20	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING RESPONDING TO MOTION TO AMEND CASE SCHEDULE; DRAFT OPPOSITION TO AMEND CASE SCHEDULE; REVIEW/ANALYZE MOTION AND DECLARATIONS	2.5	1,350.00
10/29/20	DWW	REVIEW/REVISION OF OPPOSITION TO MOTION TO MODIFY CASE MANAGEMENT ORDER; REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING MODIFYING HEARING DATE ON PROTECTIVE ORDER MOTION; PREPARE CORRESPONDENCE REGARDING DENIAL OF SCHEDULING REQUEST.	1.7	1,054.00
10/29/20	TN	REVIEW PLAINTIFF'S MOTION TO AMEND SCHEDULE; REVIEW CORRESPONDENCE FROM PLAINTIFF RE BRIEFING SCHEDULE	.2	71.00
10/30/20	BMC	RESEARCH REGARDING FILING [REDACTED] CLAIMS ON BEHALF OF JOINT VENTURE AND [REDACTED]	1.3	702.00
10/30/20	DWW	REVIEW/REVISION OF OPPOSITION TO MOTION TO MODIFY CASE MANAGEMENT ORDER.	.7	434.00

Date	Description of Disbursement	CheckNo	Units	Amount
9/30/20	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: USDC, NORTHERN DIST OF CA, 450 GOLDEN GATE, S.F., CA 94102 ON 9/2/20 - SAC15423	584768		154.00
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/01/20	584552		144.48
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/02/20	584552		263.11
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/03/20	584552		12.04
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/04/20	584552		12.04
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/22/20	584552		120.40

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

Buchalter

1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 10/31/20 1042863 5 Page

Date	Description of Disbursement	CheckNo	Units	Amount
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 09/24/20	584552		180.60
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 09/03/20	584552		10.27
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 09/07/20	584552		176.72
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 09/18/20	584552		36.12
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 09/22/20	584552		132.44
9/30/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 09/23/20	584552		12.04
10/02/20	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 713930444 DATED: 10/02/20 TRACKING# 771663987433 ON 09/29/20 FROM: DYLAN WISEMAN, BUCHALTER, 55 SECOND STREET, SAN FRANCISCO, CA 94105 TO: CLERK OF THE COURT, UNITED STATES DISTRICT COURT, 450 GOLDEN GATE AVE, 16TH FLOOR, SAN FRANCISCO, CA 94102	584370		11.81

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	41.3	540.00	22,302.00
ANTOINETTE N. JOHNSON	2.0	150.00	300.00
DYLAN WISEMAN	75.5	620.00	46,810.00
KARYN BALZARY	2.3	65.00	149.50
TIFFANY NG	22.3	355.00	7,916.50
Total	143.4		77,478.00

Total Fees 77,478.00
Total Disbursements 1,266.07

Matter Total \$ 78,744.07

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

Buchalter

1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

November 30, 2020
Invoice No. 1046532

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	127,496.57
Payments received through 12/03/20	9,800.00-
Previous Balance Remaining	117,696.57
Current Fees Through 11/30/20	59,463.00
Current Disbursements Through 11/30/20	.50
Invoice Total	\$ 59,463.50
Balance Due	\$ 177,160.07

Client Trust Balance 54,200.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard
go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
78,744.07	38,952.50	.00	177,160.07

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/2010465321	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/02/20	DWW	PREPARATION OF DISCOVERY PLAN.	2.1	1,302.00
11/04/20	BMC	REVIEW MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT	.5	270.00
11/04/20	DWW	REVIEW/ANALYSIS OF FIRST AMENDED COMPLAINT PROPOSED BY QUINTARA.	1.4	868.00
11/04/20	TN	CURSORY REVIEW OF DISCOVERY REQUESTS; IDENTIFY NEXT STEPS IN LITIGATION STRATEGY	.6	213.00
11/05/20	BMC	RESEARCH ABILITY TO SEEK [REDACTED]; DRAFT/REVISE COUNTERCLAIM; REVIEW/ANALYZE AMENDED COMPLAINT AND ANALYZE POTENTIAL OPPOSITION ARGUMENTS	2.4	1,296.00
11/05/20	DWW	REVIEW/ANALYSIS OF DISCOVERY SERVED BY QUINTARA; REVIEW QUINTARA'S MOTION FOR LEAVE TO AMEND.	2.6	1,612.00
11/05/20	TN	SPEAK WITH CLIENT; CORRESPOND WITH PLAINTIFF'S COUNSEL; REVIEW MOTION TO AMEND AND DRAFT COMPLAINT; EVALUATE NEXT STEPS IN LITIGATION	1.9	674.50
11/06/20	BMC	REVIEW/ANALYZE REPLY IN SUPPORT OF MOTION TO AMEND CASE SCHEDULE; DRAFT REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE; REVIEW/ANALYZE LETTER FROM D. PATTERSON REGARDING PLAINTIFF'S INITIAL DISCLOSURES	2.5	1,350.00
11/06/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING SUFFICIENCY OF RULE 256 INITIAL DISCLOSURES; REVIEW AND ANALYZE PROPOSED FIRST AMENDED COMPLAINT	1.7	1,054.00
11/06/20	TN	REVIEW REPLY TO MOTION TO AMEND SCHEDULE; REVIEW CLIENT CORRESPONDENCE; REVIEW INITIAL DISCLOSURES MEET AND CONFER LETTER	.4	142.00
11/09/20	BMC	DRAFT/REVISE REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE; REVIEW LETTER FROM D. PATTERSON REGARDING INITIAL DISCLOSURES; COMMUNICATIONS WITH D. WISEMAN REGARDING RESPONSE TO LETTER; REVIEW CASE MANAGEMENT ORDER REGARDING INITIAL DISCLOSURES; REVIEW FRCP RULE 37 REGARDING MOTIONS REGARDING DEFICIENT INITIAL DISCLOSURES	4.5	2,430.00
11/09/20	DWW	REVIEW/ANALYSIS OF SPECIAL INTERROGATORIES TO F. WANG AND RUIFENG; REVIEW INSPECTION DEMANDS FROM QUINTARA; PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH G. WANG REGARDING [REDACTED].	1.8	1,116.00
11/09/20	TN	REVIEW CORRESPONDENCE FROM CLIENT AND LITIGATION TEAM; PARTICIPATE IN CLIENT CONFERENCE CALL	1.7	603.50
11/10/20	BMC	DRAFT/REVISE REQUESTS FOR PRODUCTION SET ONE; REVIEW EMAIL SERVICE AGREEMENT FROM D. PETERSON; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	.9	486.00
11/10/20	BMC	DRAFT MOTION TO EXCLUDE EVIDENCE NOT DISCLOSED IN INITIAL DISCLOSURES OR TO COMPEL COMPLAINT INITIAL DISCLOSURES; DRAFT DECLARATION OF DYLAN WISEMAN IN SUPPORT OF MOTION; REVIEW LOCAL ORDERS AND JUDGE'S STANDING ORDER REGARDING FILING OF DISCOVERY MOTIONS; COMMUNICATIONS WITH T. NG REGARDING MOTION TO STRIKE AMENDED COMPLAINT	4.5	2,430.00
11/10/20	DWW	REVIEW/ANALYSIS OF INSPECTION DEMANDS TO QUINTARA; PREPARE CORRESPONDENCE TO B. CARR REGARDING SAME; REVIEW AND EDIT STIPULATION REGARDING ELECTRONIC SERVICE; REVIEW DRAFT CORRESPONDENCE FROM G. WANG REGARDING [REDACTED]		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/20 1046532 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/10/20	DWW	REVIEW/REVISION OF COUNTER-CLAIM AND CLAIMS FOR DEFAMATION BASED ON QUINTARA'S RESPONSE TO RUIFENG'S CUSTOMER EMAIL MESSAGE.	2.3	1,426.00
11/10/20	TN	REVIEW PARTY CORRESPONDENCE RE LITIGATION ISSUES; REVIEW CLIENT CORRESPONDENCE	1.3	806.00
11/11/20	BMC	DRAFT NOTICE OF MOTION IN SUPPORT OF MOTION TO EXCLUDE EVIDENCE NOT DISCLOSED IN INITIAL DISCLOSURES; RESEARCH [REDACTED] AND EVIDENCE SUPPORTING CLAIM; DRAFT/REVISE COUNTERCLAIM AND ADD DEFAMATION CLAIM; RESEARCH REGARDING [REDACTED]	.4	142.00
11/11/20	BMC	REVIEW/ANALYZE MOTION TO FILE AMENDED COMPLAINT; REVIEW/ANALYZE AMENDED COMPLAINT; REVIEW ORDER ON MOTION TO DISMISS REGARDING AMENDING COMPLAINT; COMMUNICATIONS WITH T. NG REGARDING OPPOSITION TO MOTION TO FILE AMENDED COMPLAINT; RESEARCH REGARDING [REDACTED]	4.8	2,592.00
11/11/20	BMC	REVIEW/ANALYZE TENTATIVE RULING ON DEMURRER; COMMUNICATIONS WITH G. ZWANG REGARDING HEARING ARGUMENTS	2.8	1,512.00
11/11/20	BMC	RESEARCH REGARDING [REDACTED]	.7	378.00
11/11/20	DWW	[REDACTED] DRAFT/REVISE COUNTERCLAIM AND ADD INTERFERENCE CLAIM REVIEWED DOC #42481294, V1 [BN] - NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE THE FIRST AMENDED COMPLAINT; MPAS - IMANAGE ACROBAT INTEGRATION COMPOSED EMAIL TO ASMITH@BUCHALTER.COM, CARR, BRANDON M., NG, TIFFANY F.: RE: ACTIVITY IN CASE 3:20-CV-04808-WHA QUINTARA BIOSCIENCES, INC. V. RUIFENG BIZTECH INC. ET AL. MOTION FOR LEAVE TO FILE [WVOV-BN.FID3231313] REVIEWED DOC #42481294, V1 [BN] - NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE THE FIRST AMENDED COMPLAINT; MPAS - IMANAGE ACROBAT INTEGRATION REVIEWED DOC #42481294, V1 [BN] - NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE THE FIRST AMENDED COMPLAINT; MPAS - IMANAGE ACROBAT INTEGRATION REVIEWED DOC #42221364, V1 [BN] - ORDER RE MOTION TO DISMISS - IMANAGE ACROBAT INTEGRATION	.8	432.00
11/11/20	TN	ANSWER QUESTIONS FROM CLIENT RE [REDACTED]; REVIEW MOTION TO COMPEL INITIAL DISCLOSURES; DISCUSS OPPOSITION TO MOTION TO AMEND WITH B. CARR	1.9	1,178.00
11/12/20	BMC	FINALIZE MOTION TO EXCLUDE EVIDENCE NOT DISCLOSED IN INITIAL DISCLOSURES; COMMUNICATIONS WITH D. WISEMAN REGARDING MOTION	.5	177.50
11/12/20	BMC	REVIEW/ANALYZE OPPOSITION TO MOTION FOR MOTION FOR PROTECTIVE ORDER RE MISAPPROPRIATED TRADE SECRETS	1.8	972.00
11/12/20	BMC	DRAFT OPPOSITION TO MOTION FOR LEAVE TO FILE AMENDED COMPLAINT; COMMUNICATION WITH D. WISEMAN REGARDING OPPOSITION ARGUMENTS; RESEARCH REGARDING [REDACTED] RESEARCH REGARDING [REDACTED]	.6	324.00
11/12/20	DWW	REVIEW/ANALYSIS OF OPPOSITION TO PROTECTIVE ORDER; PREPARE OUTLINE FOR REPLY; REVIEW MOTION FOR LEAVE TO AMEND; REVIEW DRAFT FIRST AMENDED COMPLAINT; PREPARE, REVISE AND EDIT OUTLINE REGARDING OPPOSITION BRIEF; TRANSMIT SHAN DECLARATION TO DR. ZHAO; REVIEW AND RESPOND TO EMAILS FROM B. CARR AND T. NG	5.8	3,132.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/20	1046532	3
Date	Tkpr	Description of Services Rendered	Hours	Amount	Page
11/12/20	TN	REGARDING PROJECT ASSIGNMENTS.	3.7	2,294.00	
		REVIEW CORRESPONDENCE FROM LITIGATION TEAM; REVIEW OPPOSITION TO MOTION FOR PROTECTIVE ORDER; RESEARCH [REDACTED]			
		[REDACTED]	1.3	461.50	
11/13/20	BMC	DRAFT OPPOSITION TO MOTION TO AMEND COMPLAINT; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; REVIEW/ANALYZE PROPOSED AMENDED COMPLAINT	5.5	2,970.00	
11/13/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S OPPOSITION TO MOTION FOR PROTECTIVE ORDER; QUINTARA'S MOTION FOR LEAVE TO AMEND; RESEARCH REGARDING [REDACTED]	2.3	1,426.00	
11/13/20	TN	WRITE REPLY TO MOTION FOR PROTECTIVE ORDER AND OBJECTIONS TO EVIDENCE	6.4	2,272.00	
11/16/20	BMC	DRAFT/FINALIZE OPPOSITION TO MOTION TO AMEND COMPLAINT; REVIEW/ANALYZE PROPOSED AMENDED COMPLAINT	1.4	756.00	
11/16/20	DWW	REVIEW/REVISION OF REPLY TO MOTION FOR PROTECTIVE ORDER; REVIEW CITED AUTHORITY; RESEARCH REGARDING [REDACTED]	5.6	3,472.00	
11/16/20	DWW	REVIEW/REVISION OF OPPOSITION TO MOTION FOR LEAVE TO AMEND; REVIEW CITED AUTHORITY.	1.1	682.00	
11/17/20	BMC	DRAFT/REVISE OPPOSITION TO PLAINTIFF'S MOTION TO AMEND COMPLAINT; REVIEW/UPDATE DOCKET	.8	432.00	
11/17/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S OPPOSITION TO PROTECTIVE ORDER; REVISE AND EDIT REPLY BRIEF; REVISE AND EDIT EVIDENTIARY OBJECTIONS; REVIEW AND EDIT OPPOSITION FOR LEAVE TO AMEND TO FILE FIRST AMENDED COMPLAINT.	4.7	2,914.00	
11/17/20	KB	PROOFREAD DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT,	.7	45.50	
11/17/20	TN	REVISE REPLY TO MOTION FOR PROTECTIVE ORDER; REVIEW CORRESPONDENCE FROM PLAINTIFF	.2	71.00	
11/18/20	BMC	REVIEW ORDER REGARDING DISCOVERY AND SCHEDULING	.2	108.00	
11/18/20	DWW	REVIEW/REVISION OF WRITTEN DISCOVERY RESPONSES FOR DEFENDANTS; REVIEW ORDER GRANTING PROTECTIVE ORDER IN FAVOR OF DEFENDANTS; PREPARE EMAIL UPDATE TO G. WANG.	1.1	682.00	
11/18/20	TN	DRAFT WRITTEN DISCOVERY RESPONSES	4.8	1,704.00	
11/19/20	BMC	REVIEW COURT ORDER VACATING HEARINGS; REVIEW CASE DOCKET AND UPCOMING DEADLINES; REVIEW COMMUNICATIONS REGARDING PARTY DEPOSITIONS	.5	270.00	
11/19/20	DWW	COUNSEL FOR QUINTARA REGARDING DEPOSITION SCHEDULING AND DELAYS FOR DISCOVERY.	.7	434.00	
11/19/20	TN	REVIEW COURT ORDERS AND COUNSEL CORRESPONDENCE	.2	71.00	
11/20/20	DWW	REVIEW/ANALYSIS OF DRAFT DISCOVERY RESPONSES FOR G. WANG AND RUIFENG.	2.1	1,302.00	
11/23/20	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING WITHDRAWAL OF WRITTEN DISCOVERY; EMAIL TO T. NG REGARDING DEPOSITION SCHEDULING.	.4	248.00	
11/23/20	TN	REVIEW PARTY CORRESPONDENCE RE DISCOVERY ISSUES	.1	35.50	
11/24/20	BMC	REVIEW/ANALYZE REPLY BRIEF IN SUPPORT OF MOTION FOR LEAVE TO AMEND COMPLAINT	.6	324.00	

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/20	1046532	4
Date	Tkpr	Description of Services Rendered	Hours	Amount	
11/24/20	TN	PREPARE DEPOSITION NOTICES; REVIEW REPLY TO MOTION TO AMEND COMPLAINT; REVIEW PARTY CORRESPONDENCE	1.2	426.00	
11/25/20	BMC	REVIEW/ANALYZE OPPOSITION TO MOTION TO COMPEL FURTHER INITIAL DISCLOSURES	.5	270.00	
11/25/20	TN	REVIEW CORRESPONDENCE FROM CLIENT RE [REDACTED]	.1	35.50	
11/30/20	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING REPLY TO MOTION TO COMPEL COMPLIANT INITIAL DISCLOSURES; MEET AND CONFER WITH D. PETERSON REGARDING MOTION TO COMPEL COMPLIANT INITIAL DISCLOSURES AND WITHDRAWING DISCOVERY	.6	324.00	
11/30/20	BMC	REVIEW/ANALYZE OPPOSITION TO MOTION TO COMPEL AMENDED INITIAL DISCLOSURES; REVIEW CASE LAW CITED IN OPPOSITION; RESEARCH [REDACTED]			
		[REDACTED] RESEARCH [REDACTED]	3.5	1,890.00	
11/30/20	BMC	DRAFT REPLY IN SUPPORT OF MOTION TO EXCLUDE EVIDENCE NOT DISCLOSED IN INTIAL DISCLOSURES	4.2	2,268.00	
11/30/20	DWW	REVIEW/ANALYSIS OF QUINTARA'S OPPOSITION TO MOTION FOR EVIDENTIARY SANCTIONS; REVIEW AND RESPOND TO CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING SAME; PREPARE EMAIL CORRESPONDENCE TO COUNSEL FOR QUINTARA CONFIRMING WITHDRAWAL OF WRITTEN DISCOVERY.	3.4	2,108.00	
11/30/20	TN	REVIEW OPPOSITION TO MOTION TO EXCLUDE EVIDENCE; REVIEW LITIGATION TEAM CORRESPONDENCE RE STRATEGY; REVIEW CORRESPONDENCE FROM PLAINTIFF RE DISCOVERY MEET AND CONFER	.7	248.50	
Date	Description of Disbursement	CheckNo	Units	Amount	
10/12/20	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 10/12/20			.50	
Recap of Services		Hours	Effective Rate	Fees	
BRANDON M. CARR		50.4	540.00	27,216.00	
DYLAN WISEMAN		40.2	620.00	24,924.00	
KARYN BALZARY		.7	65.00	45.50	
TIFFANY NG		20.5	355.00	7,277.50	
Total		111.8		59,463.00	
Total Fees				59,463.00	
Total Disbursements				.50	
Matter Total				\$ 59,463.50	

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

December 31, 2020
Invoice No. 1051759

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	177,160.07
Payments received through 01/07/21	119,200.00-
Adjustments through 12/31/20	11,796.00-
Previous Balance Remaining	46,164.07
Current Fees Through 12/31/20	61,472.50
Current Disbursements Through 12/31/20	137.39
Invoice Total	\$ 61,609.89
Balance Due	\$ 107,773.96

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
46,164.07	.00	.00	107,773.96

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/20	1051759
			Page	1
Date	Tkpr	Description of Services Rendered	Hours	Amount
12/01/20	BMC	DRAFT/REVISE REPLY BRIEF IN SUPPORT OF MOTION FOR AMENDED INITIAL DISCLOSURES; DRAFT/REPLY DECLARATION OF B. CARR IN SUPPORT OF REPLY	5.8	3,132.00
12/01/20	BMC	RESEARCH REGARDING [REDACTED]	.7	378.00
12/01/20	DWW	REVIEW/REVISION OF REPLY TO MOTION TO EXCLUDE EVIDENCE NOT DISCLOSED UNDER RULE 26; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING DEPOSITIONS.	2.1	1,302.00
12/02/20	BMC	DRAFT/REVISE REPLY IN SUPPORT OF MOTION FOR AMENDED DISCLOSURES; DRAFT/REVISE REPLY; PREPARE EXHIBITS; REVIEW D. PETERSON DECLARATION IN SUPPORT OF OPPOSITION	2.1	1,134.00
12/02/20	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING WITHDRAWING WRITTEN DISCOVERY, DEPOSITIONS, AND BAD FAITH CONDUCT; REVISE AND EDIT REPLY BRIEF AND WISEMAN DECLARATION REGARDING RULE 37 MOTION FOR SANCTIONS FOR FAILING TO COMPLY WITH RULE 26.	3.1	1,922.00
12/02/20	KB	PROOFREAD REPLY IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE ALL EVIDENCE NOT DISCLOSED IN PLAINTIFFS' INITIAL DISCLOSURES OR ALTERNATIVELY TO COMPEL FULL AND FAITHFUL COMPLIANCE WITH FRCP 26, REQUEST FOR SANCTIONS, DECLARATION OF BRANDON CARR IN SUPPORT.	.7	45.50
12/02/20	TN	REVIEW PLAINTIFF'S TRADE SECRET DISCLOSURE	.3	106.50
12/03/20	BMC	REVIEW/ANALYZE PLAINTIFF'S TRADE SECRET DISCLOSURE; FINALIZE REPLY IN SUPPORT OF MOTION FOR AMENDED INITIAL DISCLOSURES; CONFERENCE WITH D. WISEMAN REGARDING PLAINTIFFS' AMENDED TRADE SECRET DISCLOSURE; REVIEW DECLARATION OF D. PETERSON IN OPPOSITION TO REPLY; RESEARCH REGARDING [REDACTED]	1.9	1,026.00
12/03/20	BMC	REVIEW ORDER REGARDING TRADE SECRET DISCLOSURE AND ASSESS COMPLIANCE IN PREPARATION OF CALL WITH D. WISEMAN	.4	216.00
12/03/20	DWW	REVIEW/ANALYSIS OF AMENDED TRADE SECRET DISCLOSURE STATEMENT; TELEPHONE CONFERENCE WITH T. NG AND B. CARR REGARDING SAME; PREPARE, REVISE AND EDIT MEET AND CONFER FOURTEEN PAGE LETTER REGARDING DEFICIENCIES IN AMENDED DISCLOSURE.	6.3	3,906.00
12/03/20	TN	REVIEW LITIGATION TEAM CORRESPONDENCE; REVIEW SUPPLEMENTAL DECLARATION FROM PLAINTIFF; DISCUSS NEXT STEPS IN LITIGATION; REVIEW DISCOVERY REQUESTS	.7	248.50
12/04/20	BMC	RESEARCH REGARDING [REDACTED]	.7	378.00
12/04/20	BMC	RESEARCH REGARDING [REDACTED]	.6	324.00
12/04/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM T. NG REGARDING ESI COLLECTION; FINAL REVISIONS AND EDITS TO MEET AND CONFER LETTER; REVIEW RESPONSE BY COUNSEL FOR QUINTARA.	2.7	1,674.00
12/04/20	TN	REVIEW CORRESPONDENCE RE TRADE SECRET DISCLOSURE	.1	35.50
12/07/20	BMC	REVIEW MEET AND CONFER LETTER FROM D. WISEMAN TO PLAINTIFF'S COUNSEL REGARDING TRADE SECRET DISCLOSURE	.3	162.00
12/07/20	DWW	REVIEW/ANALYSIS OF COUNTER-CLAIM; REVIEW AND ANALYSIS OF AMENDED SECTION 2019.210 STATEMENT; CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING MEET AND CONFER PRIOR TO SEEKING SECOND MOTION FOR PROTECTIVE ORDER.	2.5	1,550.00
12/08/20	BMC	REVIEW/ANALYZE ORDER REGARDING MOTION TO EXCLUDE;		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/20	1051759	2
Date	Tkpr	Description of Services Rendered	Hours	Amount	Page
12/08/20	BMC	REVIEW/ANALYZE ORDER REGARDING MOTION TO AMEND COMPLAINT; COMMUNICATIONS WITH D. WISEMAN REGARDING COUNTERCLAIM AND ANSWER	.5	270.00	
12/08/20	DWW	REVIEW/ANALYZE FRAUD ALLEGATION'S EFFECT ON ADEQUACY OF OTHER CLAIMS	.4	216.00	
12/08/20	TN	REVIEW/REVISION OF COUNTER-CLAIM; PREPARE FOR MEET AND CONFER SESSION WITH COUNSEL FOR QUINTARA REGARDING DEFICIENCIES IN AMENDED CODE OF CIVIL PROCEDURE SECTION 2019.210 STATEMENT; TELEPHONIC MEET AND CONFER WITH COUNSEL FOR QUINTARA; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING SAME; EMAIL TO T. NG REGARDING STRUCTURE AND ORGANIZATION OF SECOND MOTION FOR PROTECTIVE ORDER; REVIEW COURT'S RULING ON MOTION FOR LEAVE TO AMEND; [REDACTED] TO MR. WANG [REDACTED].	3.8	2,356.00	
12/08/20	BMC	REVIEW COURT ORDER RE MOTION TO EXCLUDE AND MOTION TO AMEND; REVIEW PLAINTIFF'S CORRESPONDENCE RE MEET AND CONFER	.4	142.00	
12/09/20	DWW	DRAFT ANSWER TO AMENDED COMPLAINT	.6	324.00	
12/09/20	TN	REVIEW/REVISION OF COUNTER-CLAIM AND TRANSMIT SAME TO B. CARR AND T. NG; CORRESPONDENCE TO T. NG REGARDING MOTION FOR PROTECTIVE ORDER; PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH MR. WANG AND T. NG REGARDING [REDACTED]	2.6	1,612.00	
12/09/20	TN	TO AMEND, PROTECTIVE ORDER AND COUNTER-CLAIM; TRANSMIT COUNTER-CLAIM TO MR. WANG WITH INSTRUCTION TO TRANSLATE AND PROVIDE COMMENTS. .	.6	213.00	
12/09/20	TN	SPEAK WITH CLIENT RE [REDACTED]	.8	284.00	
12/10/20	BMC	PARTICIPATE IN CONFERENCE CALL WITH CLIENT TO [REDACTED]	.8	284.00	
12/10/20	DWW	DRAFT ANSWER TO AMENDED COMPLAINT; REVIEW AMENDED ORDER ON MOTION TO AMEND; REVIEW REVISIONS TO COUNTERCLAIM	1.7	918.00	
12/10/20	TN	TELEPHONE CONFERENCE WITH R. SCOTT REGARDING DECEMBER 11, 2020 HEARING ON MR. LA'S MOTION TO ENFORCE SETTLEMENT.	.2	124.00	
12/10/20	TN	REVIEW REVISED COURT ORDER; REVIEW CLIENT COMMENTS [REDACTED]	.3	106.50	
12/10/20	TN	WRITE FACTS AND LEGAL ARGUMENTS SECTION OF THE MOTION FOR PROTECTIVE ORDER	1.3	461.50	
12/11/20	DWW	REVIEW/ANALYSIS OF MR. WANG'S EDITS TO COUNTER-CLAIM AND EMAIL CORRESPONDENCE REGARDING CONFERENCE CALL FOR DECEMBER 14, 2020.	1.4	868.00	
12/11/20	TN	SPEAK WITH CLIENT RE [REDACTED] REVIEW SUBLEASE; PREPARE SUMMARY OF CLIENT COMMENTS TO THE COUNTER-CLAIM AND LEGAL STRATEGY	2.2	781.00	
12/11/20	TN	CONTINUE TO WRITE LEGAL ARGUMENTS SECTION OF THE MOTION FOR PROTECTIVE ORDER	1.6	568.00	
12/12/20	TN	CONTINUE TO WRITE MOTION FOR PROTECTIVE ORDER	2.4	852.00	
12/14/20	BMC	REVIEW CLIENT COMMENTS REGARDING DRAFT COUNTERCLAIM; REVIEW EMAILS FROM D. WISEMAN AND T. NG REGARDING SAME; COMMUNICATIONS WITH D. WISEMAN REGARDING PLAINTIFF'S RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE	.4	216.00	
12/14/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF SECOND MOTION FOR PROTECTIVE ORDER; TELEPHONE			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/20 1051759 3	
			Page	
Date	Tkpr	Description of Services Rendered	Hours	Amount
12/14/20	TN	CONFERENCE WITH G. WANG AND T. NG REGARDING [REDACTED] CORRESPONDENCE WITH T. NG AND TELEPHONE CONFERENCE REGARDING G. WANG'S PRIOR DECLARATION RE: MOVING FILES BELONGING TO THE JOINT VENTURE AND NEED TO CONFER WITH PROFESSIONALS HAVING PRIVILEGES.	6.2	3,844.00
12/14/20	TN	PARTICIPATE IN CLIENT CONFERENCE CALL; CONSIDER FACTUAL ISSUES IN THE COUNTER-CLAIM	1.4	497.00
12/15/20	BMC	WRITE DETAILED EMAIL TO CLIENT RE [REDACTED] [REDACTED]; REVIEW PLAINTIFF'S DISCOVERY RESPONSES	2.0	710.00
12/15/20	DWW	REVIEW/ANALYZE PLAINTIFF'S OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE; DRAFT MEET AND CONFER LETTER REGARDING DEFICIENT RESPONSES; REVIEW MOTION FOR PROTECTIVE ORDER; RESEARCH [REDACTED]	3.7	1,998.00
12/15/20	TN	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR PROTECTIVE ORDER	3.1	1,922.00
12/15/20	TN	REVIEW CLIENT CORRESPONDENCE; EVALUATE REGULATIONS TO RESOLVE LOGISTICAL ISSUES; REVIEW OPPOSING COUNSEL CORRESPONDENCE	.9	319.50
12/15/20	TN	REVISE MOTION FOR PROTECTIVE ORDER; PREPARE DECLARATION AND PROPOSED ORDER	1.3	461.50
12/16/20	DWW	REVIEW/REVISION OF SECOND MOTION FOR PROTECTIVE ORDER; EMAIL COMMUNICATIONS TO T. NG REGARDING FINAL EDITS; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING REFUSAL TO SCHEDULE DEPOSITIONS IN JANUARY OR FEBRUARY.	3.3	2,046.00
12/16/20	KB	PROOFREAD DEFENDANTS' NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER PENDING PLAINTIFF'S IDENTIFICATION OF ITS ALLEGEDLY MISAPPROPRIATED TRADE SECRETS AND FOR MONETARY SANCTIONS.	.9	58.50
12/16/20	TN	***NO CHARGE***: (NO CHARGE) RESOLVE ACCOUNTING ISSUES	1.8	
12/16/20	TN	FINALIZE MOTION FOR PROTECTIVE ORDER; REVIEW AND RESPOND TO CLIENT CORRESPONDENCE; REVIEW LOCAL RULES TO ENSURE COMPLIANCE WITH SEALING PROCEDURES	.7	248.50
12/16/20	TN	PREPARE ADMINISTRATIVE MOTION TO FILE MOTION UNDER SEAL	.8	284.00
12/17/20	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S RESPONSES TO REQUESTS FOR PRODUCTION SET ONE	.3	162.00
12/18/20	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S RESPONSES TO REQUESTS FOR PRODUCTION	.2	108.00
12/18/20	TN	***NO CHARGE***: (NO CHARGE) RESOLVE ACCOUNTING ISSUES	1.0	
12/18/20	TN	SPEAK WITH CLIENT RE [REDACTED]	.2	71.00
12/21/20	BMC	MEET AND CONFER TELECONFERENCE WITH D. PETERSON REGARDING RESPONSES TO REQUESTS FOR PRODUCTION, SET ONE; REVIEW/ANALYZE SUPPLEMENTAL ORDER TO ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE	.8	432.00
12/22/20	BMC	REVIEW ORDER RE MOTION FOR PROTECTIVE ORDER AND RE SEALING REQUESTS: REVIEW CASE CITED IN ORDER REGARDING MOTION TO STRIKE: COMMUNICATIONS WITH D. WISEMAN REGARDING MOTION TO STRIKE AND OBJECTIONS TO DISCOVERY; REVIEW/ANALYZE PLAINTIFF'S AMENDED COMPLAINT	1.8	972.00
12/22/20	BMC	RESEARCH RESPONSE [REDACTED]; RESEARCH REGARDING [REDACTED]; COMMUNICATIONS		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/2010517594	
Date	Tkpr	Description of Services Rendered	Hours	Amount
12/22/20	DWW	WITH A. SMITH REGARDING ANSWER TO AMENDED COMPLAINT	.6	324.00
12/22/20	TN	REVIEW/ANALYSIS OF FIRST AMENDED COMPLAINT AND QUINTARA'S DEFICIENT DISCOVERY REPOSSESSED.	1.4	868.00
12/23/20	BMC	REVIEW COURT ORDER; REVIEW AUTHORITIES RELEVANT TO PENDING MOTION; CONSIDER NEXT STEPS IN LITIGATION; CORRESPOND WITH CLIENT RE [REDACTED]	.9	319.50
12/23/20	BMC	REVIEW DOCKET REPORT REGARDING RESPONDING TO AMENDED COMPLAINT; RESEARCH [REDACTED]		
12/23/20	BMC	[REDACTED] REVIEW COURT ORDER REGARDING FILING MOTION TO STRIKE; DRAFT DEFENDANTS' NOTICE OF MOTION AND MOTION TO STRIKE: (1) PLAINTIFF'S MISAPPROPRIATION OF TRADE SECRETS CLAIM; AND (2) FRAUD ALLEGATIONS FROM PLAINTIFF'S AMENDED COMPLAINT; REVIEW NOTES FROM D. WISEMAN REGARDING CALL WITH MR. WANG ON COUNTERCLAIM; COMMUNICATIONS WITH T. NG REGARDING COUNTERCLAIM; REVIEW/ANALYZE MOTION TO SEAL LOCAL RULES	6.5	3,510.00
12/23/20	DWW	REVIEW RESPONSE TO MEET AND CONFER LETTER FROM D. PETERSON REGARDING DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS	.4	216.00
12/23/20	TN	TELEPHONE CONFERENCE WITH MR. WANG AND T. NG REGARDING [REDACTED]	.8	496.00
12/23/20	TN	EVALUATE NEXT STEPS IN LITIGATION; CORRESPOND WITH CLIENT; PARTICIPATE IN CONFERENCE CALL WITH CLIENT TO [REDACTED]	1.7	603.50
12/23/20	TN	***NO CHARGE***: RESOLVE ACCOUNTING ISSUES	.8	
12/23/20	TN	FURTHER REVISE DISCOVERY RESPONSES	1.0	355.00
12/24/20	BMC	DRAFT/REVISE MOTION TO STRIKE TRADE SECRET CLAIMS AND FRAUD ALLEGATIONS; RESEARCH REGARDING [REDACTED]		
12/24/20	BMC	[REDACTED]; RESEARCH REGARDING [REDACTED]; COMMUNICATIONS WITH T. NG REGARDING ADMIN MOTION TO SEAL MOTION TO STRIKE; DECLARATION OF DYLAN WISEMAN IN SUPPORT OF MOTION TO STRIKE; DRAFT PROPOSED ORDER GRANTING MOTION TO STRIKE	4.7	2,538.00
12/24/20	TN	REVIEW/ANALYZE PLAINTIFF'S AMENDED DISCLOSURE FOR MOTION TO STRIKE; REVIEW/ANALYZE RESPONSE LETTER FROM D. WISEMAN FOR MOTION TO STRIKE; REVIEW CASES CITING TO JOBSOURCE INC. V. CVPARTNERS INC. FOR MOTION TO STRIKE	.5	270.00
12/25/20	BMC	CORRESPOND WITH ALAN LI; FURTHER [REDACTED]; PREPARE MEET AND CONFER LETTER TO PLAINTIFF RE MOTION TO STRIKE	.8	284.00
12/26/20	BMC	ANALYZE AND RECOMMEND REDACTIONS IN MOTION TO STRIKE AND DECLARATION OF D. WISEMAN; DRAFT ANSWER TO AMENDED COMPLAINT	.9	486.00
12/26/20	TN	DRAFT ANSWER TO AMENDED COMPLAINT	1.5	810.00
12/28/20	TN	CONTINUE TO PREPARE MEET AND CONFER LETTER TO PLAINTIFF RE MOTION TO STRIKE	1.8	639.00
12/28/20	TN	PREPARE FOR AND ATTEND CLIENT CONFERENCE CALL TO DISCUSS [REDACTED]; PREPARE NOTES BASED ON MEETING TO DISCUSS SERVER RELATED FACTS	1.4	497.00
12/29/20	TN	REVISE DISCOVERY RESPONSES AND CORRESPOND WITH CLIENT RE [REDACTED]	1.0	355.00
12/29/20	TN	DISCUSS DISCOVERY RESPONSES WITH CLIENT; REVIEW SHAREHOLDER MEETING NOTICE AND CORRESPOND WITH CLIENT [REDACTED]	.7	248.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/20 1051759 Page 5	
Date	Tkpr	Description of Services Rendered	Hours	Amount
12/29/20	TN	***NO CHARGE***: (NO CHARGE) [REDACTED] WITH CLIENT	.5	
12/30/20	DWW	REVIEW/REVISION OF MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO STRIKE; REVISE AND EDIT COUNTER-CLAIM; REVISE AND EDIT ANSWER; REVIEW AND EDIT DISCOVERY RESPONSES; PREPARE CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING MEETING AND CONFERRING; REVIEW EMAIL CORRESPONDENCE FROM T. NG REGARDING 2018 OFFER FROM FRENCH COMPANY BASED ON PURCHASE FO ENTIRE BUSINESS; REVISE AND EDIT COUNTER-CLAIM REGARDING SAME.	6.9	4,278.00
12/30/20	KP	EMAIL CORRESPONDENCE WITH T. NG AND HAYSTACKID (VENDOR)RE CLIENT DATA COLLECTIONS ESTIMATE.	.6	105.00
12/30/20	TN	WORK ON COUNTER CLAIM	.4	142.00
12/30/20	TN	WORK ON ADMINISTRATIVE MOTION TO SEAL	1.6	568.00
12/30/20	TN	REVIEW MOTION TO STRIKE FOR ADMINISTRATIVE MOTION PURPOSES; REVIEW DRAFT ANSWER	.9	319.50
12/30/20	TN	CORRESPOND WITH CLIENT RE [REDACTED]	.6	213.00
12/31/20	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM T. NG WITH MR. WANG'S COMMENTS REGARDING ANSWER TO FIRST AMENDED COMPLAINT; REVIEW CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING NO OBLIGATION TO MEET AND CONFER; REVIEW EDITED MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO STRIKE.	1.2	744.00
12/31/20	KB	PROOFREAD NOTICE OF MOTION AND MOTION TO STRIKE MISAPPROPRIATION OF TRADE SECRETS CLAIM AND FRAUD ALLEGATIONS FROM FIRST AMENDED COMPLAINT, MEMO OF P&AS.	1.3	84.50
12/31/20	TN	SPEAK WITH CLIENT RE [REDACTED]; REVIEW CLIENT'S CORRESPONDENCE RE [REDACTED]; REVISE ANSWER	.6	213.00

Date	Description of Disbursement	CheckNo	Units	Amount
12/01/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 11/05/20	585844		12.49
12/01/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 11/13/20	585844		12.49
12/01/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY NG, TIFFANY ON 11/18/20	585844		12.49
12/01/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 11/16/20	585844		87.43
12/01/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 11/25/20	585844		12.49

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	38.0	540.00	20,520.00
DYLAN WISEMAN	47.6	620.00	29,512.00
KARYN BALZARY	2.9	65.00	188.50
KEVIN PARKER	.6	175.00	105.00
TIFFANY NG	31.4	355.00	11,147.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/20 1051759 Page 6
-----------------------	---------	--	-------------------------------

Recap of Services		Hours	Effective Rate	Fees
		4.1		No Charge
Total		124.6		61,472.50
Total Fees				61,472.50
Total Disbursements				137.39
Matter Total				\$ 61,609.89

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

January 31, 2021
Invoice No. 1056123

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	107,773.96
Payments received through 02/04/21	20,000.00-
Previous Balance Remaining	87,773.96
Current Fees Through 01/31/21	60,217.00
Current Disbursements Through 01/31/21	97.91
Invoice Total	\$ 60,314.91
Balance Due	\$ 148,088.87

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
61,609.89	26,164.07	.00	148,088.87

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		1/31/21 1056123 Page 1
Date	Tkpr	Description of Services Rendered	Hours	Amount
1/01/21	BMC	DRAFT/REVISE MOTION TO STRIKE; REVIEW MEET AND CONFER LETTER REGARDING AMENDED COMPLAINT; RESEARCH REGARDING [REDACTED]; RESEARCH REGARDING [REDACTED]; RESEARCH REGARDING [REDACTED]; RESEARCH REGARDING [REDACTED]	5.5	2,970.00
1/02/21	BMC	REVIEW EDITS FROM D. WISEMAN ON MOTION TO STRIKE; REVIEW/FINALIZE MOTION TO STRIKE; DRAFT/REVISE ANSWER TO AMENDED COMPLAINT	2.3	1,242.00
1/04/21	BMC	DRAFT/REVISE MOTION TO STRIKE AND D. WISEMAN DECLARATION; DRAFT/REVISE COUNTERCLAIM; REVIEW REVISIONS TO ANSWER TO AMENDED COMPLAINT; RESEARCH [REDACTED]; COMMUNICATIONS WITH D. WISEMAN AND T. NG REGARDING DISCOVERY RESPONSES AND MOTION TO SEAL	2.9	1,566.00
1/04/21	DWW	REVIEW/REVISION OF ANSWER TO AMENDED COMPLAINT; REVISE AND EDIT COUNTER-CLAIM; REVIEW, REVISE AND EDIT COUNTER-CLAIM; MULTIPLE EMAIL COMMUNICATIONS TO G. WANG; MULTIPLE EMAILS TO T. NG REGARDING ANSWER AND COUNTER-CLAIMS; REVIEW, REVISE AND EDIT MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO STRIKE; REVISE AND EDIT WISEMAN DECLARATION IN SUPPORT OF MOTION TO STIKE; REVIEW DATA ANALYTICS ON JUDGE ALSUP'S DISPOSITION OF TRADE SECRETS CLAIMS; PREPARE EMAIL TO B. CARR AND T. NG REGARDING MOTION TO STRIKE.	6.7	4,154.00
1/04/21	TN	SPEAK WITH CLIENT MULTIPLE TIMES RE [REDACTED]; WORK ON VARIOUS RESPONSIVE PLEADINGS AND COUNTER CLAIM; FURTHER REVISE MOTION TO SEAL	2.4	876.00
1/05/21	BMC	REVIEW JUDGE'S STANDING ORDER REGARDING MOTIONS TO SEAL; COMMUNICATIONS WITH T. NG REGARDING MOTION TO SEAL; COMMUNICATIONS WITH A. SMITH REGARDING EXHIBITS AND REDACTIONS FOR MOTION TO STRIKE; REVIEW/FINALIZE MOTION TO STRIKE AND VERIFY CITATIONS TO EVIDENCE	2.5	1,350.00
1/05/21	DWW	REVIEW/REVISION OF MOTION TO STRIKE DTSA CLAIM AND FRAUD ALLEGATIONS, WISEMAN DECLARATION IN SUPPORT OF MOTION TO STRIKE, PROPOSED ORDER, ADMINISTRATIVE MOTION AND SUPPORTING DOCUMENTS.	3.7	2,294.00
1/05/21	KB	PROOFREAD DEFENDANT'S AND COUNTER CLAIMANT'S COUNTERCLAIM.	2.1	136.50
1/05/21	TN	FINALIZE VARIOUS PLEADINGS	3.5	1,277.50
1/06/21	BMC	REVIEW/ANALYZE DEFENDANTS' OBJECTIONS TO REQUESTS FOR ADMISSION IN MEET AND CONFER LETTER; DRAFT RESPONSE TO DEFENDANTS' MEET AND CONFER LETTER RE REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE	3.5	1,890.00
1/06/21	DWW	REVIEW/ANALYSIS OF MEET AND CONFER EFFORTS AND REQUESTS FOR PRODUCTION OF DOCUMENTS (SET ONE); EMAIL CORRESPONDENCE WITH B. CARR REGARDING FURTHER MEET AND CONFER EFFORTS; PREPARE EMAIL TO COUNSEL FOR QUINTARA REGARDING STATUS OF DOCUMENT PRODUCTION.	.3	186.00
1/06/21	TN	SPEAK WITH CLIENT TO [REDACTED]; RESPOND TO CLIENT'S [REDACTED]; REVIEW PLAINTIFF'S CORRESPONDENCE	1.0	365.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		1/31/21 1056123 2
Date	Tkpr	Description of Services Rendered	Hours	Amount
1/07/21	BMC	DRAFT RESPONSE TO PLAINTIFF'S MEET AND CONFER LETTER REGARDING DOCUMENT PRODUCTION; REVIEW REQUESTS FOR PRODUCTION OF DOCUMENTS AND ASSESS OBJECTIONS; REVIEW JUDGE'S STANDING ORDER REGARDING PRODUCTION OF DOCUMENTS; COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S DOCUMENT PRODUCTION	1.5	810.00
1/07/21	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING NO DOCUMENT PRODUCTION AND SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS.	.4	248.00
1/08/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING DISCOVERY AND RESPONSE TO MEET AND CONFER LETTER ON REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE; DRAFT/REVISE MEET AND CONFER LETTER REGARDING SAME; COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S DOCUMENT PRODUCTION	.8	432.00
1/08/21	DWW	REVIEW/ANALYSIS OF QUINTARA'S RESPONSES TO REQUESTS FOR PROTECTION OF DOCUMENTS; PREPARE EMAIL TO B. CARR REGARDING MEET AND CONFER EFFORTS.	.6	372.00
1/08/21	TN	REVIEW CORRESPONDENCE RE LITIGATION ISSUES	.2	73.00
1/11/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING MEETING AND CONFERRING ON PLAINTIFF'S DISCOVERY RESPONSES AND DOCUMENTS; REVIEW PLAINTIFF'S AMENDED DISCLOSURES; REVIEW/ANALYZE DECLARATION OF SUE ZHAO, PH.D., TO SUPPORT THE DESIGNATION OF PORTIONS OF PLAINTIFF'S AMENDED TRADE SECRET DISCLOSURE; COMMUNICATIONS WITH T. NG REGARDING AMENDED MOTION TO SEAL; REVIEW RULES REGARDING AMENDMENTS TO INITIAL DISCLOSURES; COMMUNICATIONS WITH D. WISEMAN REGARDING AMENDING INITIAL DISCLOSURES; REVIEW RUIFENG'S DAMAGE SPREADSHEET FOR AMENDED DISCLOSURES	1.5	810.00
1/11/21	DWW	REVIEW/REVISION OF QUINTARA'S SUPPLEMENTAL RULE 26 INITIAL DISCLOSURES; PREPARE EMAIL RESPONSE TO COUNSEL FOR QUINTARA; EMAIL MESSAGES WITH B. CARR REGARDING MEET AND CONFER EFFORTS.	.9	558.00
1/11/21	TN	REVIEW CORRESPONDENCE RELATED TO DISCOVERY ISSUES; REVIEW AND REVISE FORENSIC QUESTIONNAIRE; REVIEW AMENDED DISCLOSURE AND ZHAO DECLARATION; CORRESPOND WITH CLIENT RE [REDACTED]	1.0	365.00
1/12/21	BMC	MEET AND CONFER WITH D. PETERSON REGARDING REQUESTS FOR PRODUCTION AND DEPOSITIONS; COMMUNICATIONS WITH D. WISEMAN REGARDING MEET AND CONFER AND MOTION TO COMPEL	1.2	648.00
1/12/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM B. CARR REGARDING FURTHER MEETING AND CONFERRING; REVIEW CORRESPONDENCE FROM MR. WANG AND PREPARE REQUEST TO T. NG FOR PROFESSIONAL TRANSLATION.	.8	496.00
1/12/21	TN	SPEAK WITH CLIENT RE DAMAGES; REVIEW DOCUMENTS FROM CLIENT; CORRESPOND WITH VENDOR RE DISCOVERY ISSUES; REVIEW DISCOVERY RELATED CORRESPONDENCE FROM PLAINTIFF	1.4	511.00
1/13/21	BMC	MEET AND CONFER WITH D. PETERSON REGARDING PLAINTIFF'S DOCUMENT PRODUCTION AND DISCOVERY RESPONSES (MULTIPLE EXCHANGES); COMMUNICATIONS WITH D. WISEMAN AND T. NG REGARDING DEPOSITIONS; REVIEW STANDING ORDER REGARDING DISCOVERY DOCUMENT PRODUCTIONS; REVIEW LETTER FROM J. LI TO COURT REGARDING STAY OF		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	1/31/21 1056123 3	
			Page	
Date	Tkpr	Description of Services Rendered	Hours	Amount
1/13/21	ANJ	DISCOVERY	.9	486.00
1/13/21	ANJ	DRAFT REQUEST FOR ADMISSIONS GENUINENESS OF DOCUMENTS; RESEARCH [REDACTED]	2.1	315.00
1/13/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING SCOPE OF RULING ON PROTECTIVE ORDER; REVIEW EMAIL MESSAGES FROM B. CARR REGARDING DEPOSITION SCHEDULING.	1.1	682.00
1/13/21	TN	REVIEW VARIOUS DISCOVERY CORRESPONDENCE WITH PLAINTIFF; CORRESPOND WITH CLIENT RE [REDACTED]; PREPARE LETTER RESPONSE RE DISCOVERY ISSUES	1.3	474.50
1/14/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM QUINTARA SEEKING CLARIFICATION OF RULING ON PROTECTIVE ORDER; REVIEW AND EDIT RESPONSE REGARDING SAME.	1.4	868.00
1/14/21	TN	REVIEW LOCAL RULES RELATED TO ADMINISTRATIVE MOTION TO SEAL PROCEDURES; REVIEW DOCUMENTS FROM CLIENT	.3	109.50
1/15/21	BMC	COMMUNICATIONS WITH T. NG REGARDING RUIFENG'S DAMAGES FOR AMENDED DISCLOSURES; REVIEW/ANALYZE DAMAGE DOCUMENTS FORM T. NG; REVIEW/ANALYZE ACCOUNGINT AUDIT LETTER FOR MOTION TO COMPEL; COMMUNICATIONS WTH D. PETERSON REGARDING DEPOSITIONS; DRAFT/REVISE REQUESTS FOR ADMISSION, SET ONE	2.7	1,458.00
1/15/21	ANJ	REVISE DRAFT REQUESTS FOR ADMISSIONS TO QUINTARA BIOSCIENCE, INC.	.6	90.00
1/15/21	DWW	REVIEW/REVISION OF LETTER TO JUDGE ALSUP'S CLERK; REVIEW MINUTE ORDER FROM CLERK; REVIEW EMAIL MESSAGES FROM G. WANG REGARDING DAMAGES FOR COUNTER-CLAIM.	1.1	682.00
1/15/21	TN	SPEAK WITH CLIENT RE DAMAGES; FURTHER CONSIDER DAMAGES ISSUES	.8	292.00
1/18/21	TN	REVIEW CLIENT AND PLAINTIFF CORRESPONDENCE; REVIEW REVISED DECLARATION RE MOTION TO SEAL	.2	73.00
1/19/21	BMC	COMMUNICATIONS WITH D. PETERSON AND D. WISEMAN REGARDING PARTY DEPOSITIONS; REVIEW AMENDED DECLARATION OF SUE ZHAO REGARDING DESIGNATING PLAINTIFF'S AMENDED TRADE SECRET DISCLOSURE AS ATTORNEYS' EYES ONLY; COMMUNICATIONS WITH T. NG REGARDING DEFENDANTS' AMENDED INITIAL DISCLOSURES; REVIEW/ANALYZE OPPOSITION TO MOTION TO STRIKE; DRAFT/REVISE REQUESTS FOR ADMISSION, SET ONE	3.5	1,890.00
1/19/21	DWW	REVIEW/ANALYSIS OF QUINTARA'S OPPOSITION TO MOTION TO STRIKE; BEGIN TO PREPARE OUTLINE REGARDING REPLY BRIEF; REVIEW STIPULATION REGARDING QUINTARA'S RESPONSE TO COUNTER-CLAIM.	2.6	1,612.00
1/19/21	TN	CONSIDER NEXT STEPS IN LITIGATION; CURSORY REVIEW OF OPPOSITION TO MOTION TO STRIKE	.4	146.00
1/20/21	BMC	REVIEW/ANALYZE PLAINTIFF'S OPPOSITION TO MOTION TO STRIKE AND AUTHORITIES; REVIEW OUTLINE OF REPLY BRIEF FROM D. WISEMAN; REVIEW/ANALYZE JUDGE'S STANDING ORDER REGARDING DISCOVERY DISPUTES, DRAFT SPECIAL INTERROGATORIES, SET ONE TO PLAINTIFF	2.8	1,512.00
1/20/21	DWW	REVIEW/REVISION OF OUTLINE REGARDING REPLY BRIEF TO OPPOSITION TO MOTION TO STRIKE.	2.3	1,426.00
1/20/21	DWW	PREPARATION OF AND PARTICIPATE IN TELEPHONE CONFERENCE WITH G. WANG [REDACTED] AND [REDACTED].	1.1	682.00
1/20/21	TN	CORRESPOND WITH CLIENT RE [REDACTED]		
		[REDACTED] WITH THE CLIENT	1.9	693.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		1/31/21 1056123 4
Date	Tkpr	Description of Services Rendered	Hours	Amount
1/21/21	BMC	DRAFT RULE 34 MEMO TO JUDGE ALSUP REGARDING REQUESTS FOR PRODUCTION OF DOCUMENTS DISCOVERY DISPUTE; REVIEW MEET AND CONFER COMMUNICATIONS FROM D. PETERSON FOR RULE 34 MEMO	2.5	1,350.00
1/21/21	DWW	REVIEW/ANALYSIS OF QUINTARA STIPULATION TO CONTINUE RESPONSIVE PLEADING DATE; REVIEW, REVISE AND EDIT REPLY BRIEF.	2.4	1,488.00
1/21/21	TN	REVIEW MOTION TO STRIKE AND OPPOSITION IN CONJUNCTION WITH WRITING LEGAL ARGUMENTS FOR THE REPLY; REVIEW AND TRANSLATE CLIENT CORRESPONDENCE	2.1	766.50
1/21/21	TN	WRITE REPLY IN SUPPORT OF MOTION TO STRIKE	5.8	2,117.00
1/22/21	BMC	COMMUNICATIONS WITH T. NG REGARDING RUIFENG'S DAMAGES; REVIEW DRAFT REPLY IN SUPPORT OF MOTION TO STRIKE; DRAFT/REVISE RULE 34 DISCOVERY LETTER TO JUDGE ALSUP REGARDING REQUESTS FOR PRODUCTION OF DOCUMENTS; COMMUNICATIONS WITH D. WISEMAN REGARDING DEPOSITION SCHEDULING; DRAFT/REVISE SPECIAL INTERROGATORIES SET ONE	3.2	1,728.00
1/22/21	DWW	REVIEW/REVISION OF REPLY TO MOTION TO STRIKE; TELEPHONE CALL TO R. SHAO REGARDING [REDACTED]	4.4	2,728.00
1/22/21	TN	SPEAK WITH CLIENT RE [REDACTED]; REVIEW TEAM CORRESPONDENCE RE NEXT STEPS IN LITIGATION	.4	146.00
1/25/21	BMC	REVIEW/ANALYZE BUSINESS PROPOSAL FROM T. NG FOR DAMAGES; REVIEW/ANALYZE AMENDED RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE; REVIEW/ANALYZE WHICH REQUESTS SHOULD BE COMPELLED	3.5	1,890.00
1/25/21	DWW	REVIEW/REVISION OF REPLY BRIEF TO MOTION TO STRIKE; FINAL REVISIONS AND EDITS REGARDING SAME.	3.4	2,108.00
1/25/21	KB	PROOFREAD DEFENDANTS' REPLY IN SUPPORT OF MOTION TO STRIKE (1) MISAPPROPRIATION OF TRADE SECRETS CLAIM AND (2) FRAUD ALLEGATIONS FROM PLAINTIFF'S FIRST AMENDED COMPLAINT.	.7	45.50
1/25/21	TN	REVIEW CLIENT CORRESPONDENCE; SPEAK WITH CLIENT RE [REDACTED]	.4	146.00
1/26/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE FROM T. NG REGARDING ESI COLLECTION; REVIEW CORRESPONDENCE REGARDING STATUS OF QUINTARA DOCUMENT PRODUCTION.	1.1	682.00
1/26/21	TN	FOLLOW UP WITH CLIENT RE [REDACTED]	.1	36.50
1/27/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING PLAINTIFF'S AMENDED RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS; REVIEW/ANALYZE AMENDED RESPONSES; COMMUNICATIONS WITH D. PETERSON REGARDING AMENDED RESPONSES AND DEPOSITIONS; COMMUNICATIONS WITH T. NG REGARDING DEFENDANTS' DEPOSITIONS; COMMUNICATIONS WITH T. NG REGARDING DAMAGES AND AMENDED DISCLOSURES	2.1	1,134.00
1/27/21	DWW	CORRESPONDENCE REGARDING DEPOSITION SCHEDULING; REVIEW AND EDIT MEET AND CONFER CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING ADDITIONAL DOCUMENTS	2.3	1,426.00
1/27/21	TN	CONSIDER NEXT STEPS IN LITIGATION; MANAGE DISCOVERY ISSUES; SPEAK WITH HAYSTACK RE DOCUMENT COLLECTION; PREPARE DAMAGE ESTIMATES	1.7	620.50
1/28/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING DEPOSITIONS (MULTIPLE EXCHANGES); COMMUNICATIONS WITH D. PETERSON REGARDING MEET AND		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 1/31/21 1056123 5 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
1/28/21	ANJ	CONFERRING ON AMENDED DISCOVERY RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS; COMMUNICATIONS WITH D. WISEMAN REGARDING DEPOSITION SCHEDULING	.7	378.00
1/28/21	DWW	REVIEW INVOICES AND POPULATE DAMAGES CHART.	.8	120.00
1/28/21	DWW	REVIEW/ANALYSIS OF DEPOSITION NOTICES TO QUINTARA PRINCIPALS; BEGIN TO PREPARE OUTLINE FOR DEPOSITION OF QUINTARA PRINCIPALS.	2.1	1,302.00
1/28/21	TN	SPEAK WITH CLIENT RE [REDACTED]; [REDACTED] CORRESPOND WITH CLIENT	2.1	766.50
1/29/21	BMC	COMMUNICATIONS WITH T. NG REGARDING DEFENDANTS' DAMAGES; REVIEW/ANALYZE DAMAGES SPREADSHEET FROM T. NG; DRAFT REQUESTS FOR PRODUCTION OF DOCUMENTS TO XUELING ZHAO; MEET AND CONFER CALL WITH D. PETERSON REGARDING PLAINTIFF'S AMENDED RESPONSES TO REQUESTS FOR PRODUCTION, SET ONE; REVIEW LETTER FROM D. PETERSON REGARDING PLAINTIFF'S DOCUMENT PRODUCTION	2.9	1,566.00
1/29/21	DWW	REVIEW/ANALYSIS OF AND RESPOND TO CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING EXTENSION TO RESPOND TO COUNTER-CLAIM.	.3	186.00
1/29/21	TN	ATTEND TO DISCOVERY AND DAMAGES ISSUES	1.0	365.00

Date	Description of Disbursement	CheckNo	Units	Amount
12/31/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 12/22/20	586276		42.35
12/31/20	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 12/23/20	586276		55.56

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	46.5	540.00	25,110.00
ANTOINETTE N. JOHNSON	3.5	150.00	525.00
DYLAN WISEMAN	39.0	620.00	24,180.00
KARYN BALZARY	2.8	65.00	182.00
TIFFANY NG	28.0	365.00	10,220.00
Total	119.8		60,217.00

Total Fees 60,217.00
Total Disbursements 97.91

Matter Total \$ **60,314.91**

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

February 28, 2021
Invoice No. 1061912

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	148,088.87
Payments received through 03/08/21	20,000.00-
Previous Balance Remaining	128,088.87
Current Fees Through 02/28/21	75,600.50
Current Disbursements Through 02/28/21	15.24
Invoice Total	\$ 75,615.74
Balance Due	\$ 203,704.61

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
61,609.89	.00	6,164.07	203,704.61

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	2/28/21 1061912 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
1/28/21	NY	CONFER WITH D. WISEMAN RE VENDOR SOW.	.2	37.00
1/29/21	NY	CONFER WITH CASE TEAM RE SOW WITH FORENSIC VENDOR; REVIEW AND REVISE SOW.	.6	111.00
2/01/21	BMC	DRAFT MEET AND CONFER SUMMARY TO D. PETERSON REGARDING PLAINTIFF'S DOCUMENT RESPONSES; COMMUNICATIONS WITH T. NG REGARDING PLAINTIFF'S DOCUMENT PRODUCTION; COMMUNICATIONS WITH K. PARKER REGARDING IMPORTING PLAINTIFF'S DOCUMENTS TO RELATIVITY TO REVIEW; REVIEW/ANALYZE ESTIMATED DAMAGES CALCULATION FROM T. NG; DRAFT/REVISE REQUESTS FOR ADMISSION TO QUINTARA; DRAFT/REVISE REQUESTS FOR ADMISSION TO R. SHAN; DRAFT/REVISE SPECIAL INTERROGATORIES, SET ONE; DRAFT/REVISE REQUESTS FOR PRODUCTION OF DOCUMENT TO X. ZHAO	4.5	2,430.00
2/01/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE RETARDING QUINTARA'S REQUEST TO MOVE THE HEARING DATE FOR THE MOTION TO STRIKE/DISMISS; PREPARE RESPONSE; INITIAL REVIEW OF WRITTEN DISCOVERY.	.8	496.00
2/01/21	KP	EMAIL CORRESPONDENCE WIITH T. NG AND B. CARR; STAGE, ENCRYPT AND UPLOAD OPPOSING PRODUCTION QB001 TO SHAREFILE FOR TRANSFER TO CLIENT; CREATE NEW SHAREFILE AND RELATIVITY DATABASE PER NEW CASE ONBOARDING.	2.3	402.50
2/01/21	TN	MANAGE DISCOVERY ISSUES; SPEAK WITH CLIENT RE [REDACTED]; REVIEW CLIENT CORRESPONDENCE	.8	292.00
2/02/21	BMC	REVIEW/ANALYZE PLAINTIFF'S DOCUMENT PRODUCTION; COMMUNICATIONS WITH T. NG REGARDING DOCUMENTS AND SIGNATURES TO AUTHENTICATE; REVIEW/ANALYZE CONTRACTS FROM T. NG; COMMUNICATIONS WITH K. PARKER REGARDING PLAINTIFF'S DOCUMENT PRODUCTION	2.0	1,080.00
2/02/21	ANJ	REVIEW NEW DOCUMENTS AND COMPARE WITH DOCUMENTS ATTACHED TO REQUESTS FOR ADMISSION.	.7	105.00
2/02/21	DWW	REVIEW/ANALYSIS OF WRITTEN DISCOVERY TO QUINTARA PRINCIPALS.	.7	434.00
2/02/21	KP	UPLOAD OPPOSING COUNSEL PRODUCTION QB001 TO RELATIVITY; TROUBLESHOOT ISSUES, CONVERT QB001 IMAGES AND UPLOAD TO RELATIVITY; EMAIL CORRESPONDENCE WITH B. CARR.	3.6	630.00
2/02/21	TN	FURTHER CONSIDER DISCOVERY ISSUES	.2	73.00
2/03/21	BMC	REVIEW PLAINTIFF'S MOTION TO CONTINUE HEARING ON MOTION TO STRIKE; COMMUNICATIONS WITH K. PARKER AND T. NG REGARDING PLAINTIFF'S DOCUMENT PRODUCTION; REVIEW/ANALYZE PLAINTIFF'S DOCUMENT PRODUCTION; DRAFT/REVISE REQUESTS FOR ADMISSION, SET ONE; REVIEW EXHIBITS TO ATTACH TO REQUESTS FOR ADMISSION; DRAFT/REVISE SPECIAL INTERROGATORIES, SET ONE; DRAFT/REVISE RULE 34 LETTER TO COURT REGARDING MOTION TO COMPEL ISSUES	4.2	2,268.00
2/03/21	ANJ	PREPARE EXHIBITS TO REQUESTS FOR ADMISSION; REVISE DRAFT REQUESTS FOR ADMISSIONS TO R. SHAN AND PREPARE ADDITIONAL EXHIBITS; REVISE REQUESTS FOR ADMISSIONS TO QUINTARA BIOSCIENCE.	2.6	390.00
2/03/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE REGARDING CONTINUING MOTION TO DISMISS HEARING AND DEPOSITIONS.	.6	372.00
2/03/21	KP	EMAIL CORRESPONDENCE WITH B. CAR AND T. NGR; IDENTIFY CHINESE CHARACTER DOCUMENTS WITHIN QB001 AND BATCH FOR REVIEW PER B. CARR.	2.0	350.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		2/28/21 1061912 2
Date	Tkpr	Description of Services Rendered	Hours	Amount
2/03/21	TN	REVIEW PLAINTIFF REQUEST TO CONTINUE HEARING; CORRESPOND WITH CLIENT RE DISCOVERY ISSUES; CURSORY REVIEW OF PLAINTIFF'S DOCUMENT PRODUCTION; DISCUSS WITH CLIENT RE DISCOVERY; REVIEW QUINTARA'S DOCUMENT PRODUCTION	2.4	876.00
2/04/21	BMC	FINALIZE REQUESTS FOR ADMISSION TO QUINTARA AND REQUESTS FOR PRODUCTION TO ZHAO; COMMUNICATIONS WITH A. SMITH REGARDING SERVICE OF DISCOVERY ON PLAINTIFF	1.1	594.00
2/04/21	DWW	REVIEW/ANALYSIS OF EMAIL REGARDING SERVICE OF QUINTARA PRICNIPALS.	.2	124.00
2/04/21	TN	ADDRESS SERVICE ISSUES	.7	255.50
2/05/21	BMC	DRAFT RULE 34 LETTER TO JUDGE ALSUP REGARDING PLAINTIFF'S RESPONSES TO REQUESTS FOR PRODUCTION; REVIEW ORDER CONTINUING HEARING; COMMUNICATIONS WITH A. SMITH REGARDING SERVICE OF DISCOVERY (SET TWO)	.9	486.00
2/05/21	DWW	REVIEW/ANALYSIS OF COURT ORDER GRANTING EXTENSION OF HEARING ON MOTION TO DISMISS; REVIEW EMAIL MESSAGES REGARDING SERVICE UPON QUINTARA PRINCIPALS.	.7	434.00
2/05/21	TN	ADDRESS SERVICE ISSUES AND DISCOVERY ISSUES; REVIEW COURT ORDER	.3	109.50
2/08/21	BMC	REVIEW/ANALYZE QUINTARA'S DOCUMENT PRODUCTION	5.5	2,970.00
2/08/21	DWW	TELEPHONE CONFERENCE WITH R. SHAO REGARDING [REDACTED]; [REDACTED]; REVIEW PRIOR DECLARATION FROM R. SHAO; REVIEW LOCAL RULES REGARDING MOTION TO COMPEL AND REVIEW PRIOR MEET AND CONFER LETTERS.	1.3	806.00
2/08/21	TN	MANAGE DISCOVERY ISSUES; REVIEW COURT ORDERS	.4	146.00
2/09/21	BMC	REVIEW/ANALYZE QUINTARA'S DOCUMENT PRODUCTION; DRAFT RULE 34 LETTER TO JUDGE ALSUP REGARDING QUINTARA'S DOCUMENT RESPONSES	3.8	2,052.00
2/09/21	DWW	REVIEW/ANALYSIS OF QUINTARA'S MEET AND CONFER CORRESPONDENCE; BEGIN TO PREPARE OUTLINE FOR DEPOSITIONS.	1.1	682.00
2/09/21	TN	PARTICIPATE IN CONFERENCE CALL WITH HAYSTACK; DISCUSS [REDACTED] [REDACTED] CLIENT; REVIEW MOTION TO DISMISS AND EVALUATE LEGAL ARGUMENTS IN OPPOSITION	2.4	876.00
2/10/21	BMC	REVIEW/ANALYZE QUINTARA'S MOTION TO DISMISS AND AUTHORITIES CITED; REVIEW/ANALYZE QUINTARA'S MOTION TO STRIKE; RESEARCH REGARDING [REDACTED]; CONFERENCE WITH D. WISEMAN REGARDING RESPONSE TO MOTIONS	2.5	1,350.00
2/10/21	BMC	REVIEW/ANALYZE QUINTARA'S DOCUMENT PRODUCTION; DRAFT/REVISE RULE 34 LETTER TO JUDGE ALSUP REGARDING DEFICIENT DOCUMENT RESPONSES	4.6	2,484.00
2/10/21	DWW	REVIEW/ANALYSIS OF MOTION TO STRIKE AND MOTION TO DISMISS; TELEPHONE CONFERENCE WITH G. WANG AND T. NG REGARDING ELECTRONIC DISCOVERY COLLECTION AND OPPOSITION MOTIONS TO COMPEL.	1.3	806.00
2/10/21	TN	PARTICIPATE IN CONFERENCE CALL WITH CLIENT TO DISCUSS [REDACTED] [REDACTED]; CONSIDER LEGAL ARGUMENTS IN OPPOSITION TO MOTION TO DISMISS; CONSIDER LITIGATION STRATEGY; EVALUATE CLIENTS' INFORMATION REGARDING DAMAGES AND RATE DIFFERENTIAL	2.2	803.00
2/11/21	BMC	DRAFT/REVISE RULE 34 LETTER TO JUDGE ALSUP AND EXHIBITS; REVIEW/ANALYZE QUINTARA'S DOCUMENT PRODUCTION; COMMUNICATIONS		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	2/28/21 1061912 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
2/11/21	DWW	WITH T. NG REGARDING MISSING DOCUMENTS; DRAFT OPPOSITION TO 12B6 MOTION	4.6	2,484.00
2/11/21	TN	REVIEW/ANALYSIS OF STATUS OF EDISCOVERY COLLECTION; REVIEW, REVISE AND EDIT CORRESPONDENCE TO JUDGE ALSUP REGARDING QUINTARA'S DEFICIENT DISCOVERY RESPONSES AND LACK OF DOCUMENTS PRODUCED; CONFERENCE WITH G. WANG, T. NG, AND DISCOVERY VENDOR REGARDING [REDACTED];	2.8	1,736.00
2/12/21	BMC	DISCUSS WITH CLIENT RE [REDACTED]; REVIEW QUINTARA'S DOCUMENT PRODUCTION	2.1	766.50
2/12/21	TN	MEET AND CONFER WITH D. PETERSON REGARDING PLAINTIFF'S DOCUMENT PRODUCTION; DRAFT OPPOSITION TO 12B6 MOTION; RESEARCH REGARDING [REDACTED]; REVIEW/ANALYZE PLAINTIFF'S 12B6 MOTION; CONFERENCE WITH T. NG REGARDING LOANS FROM RUIFENG TO QUINTARA; REVIEW/ANALYZE TRANSLATION OF COOPERATION AGREEMENT	6.5	3,510.00
2/14/21	TN	REVIEW TRANSLATED CONTRACT; CONSIDER OTHER ISSUES RELATED TO DISCOVERY AND MOTION TO DISMISS	1.1	401.50
2/14/21	TN	CONTINUE TO REVIEW QUINTARA'S DOCUMENT PRODUCTION	2.7	985.50
2/15/21	TN	WORK ON DOCUMENT REVIEW LOG	.9	328.50
2/16/21	BMC	CONTINUE TO PREPARE DOCUMENT LOG FOR QUINTARA'S DOCUMENT PRODUCTION	2.8	1,022.00
2/16/21	BMC	DRAFT OPPOSITION TO 12B6 MOTION COMMUNICATIONS WITH D. WISEMAN REGARDING SERVICE OF COUNTERCLAIM ON QUINTARA'S PRINCIPALS; COMMUNICATIONS WITH D. WISEMAN REGARDING PLAINTIFF'S SUPPLEMENTAL DISCOVERY RESPONSES/PRODUCTION; COMMUNICATIONS WITH D. PETERSON REGARDING DEADLINE TO SERVE AMENDED RESPONSES AND SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW ORDER SETTING DISCOVERY HEARING; COMMUNICATIONS WITH T. NG REGARDING DEFENDANTS' DAMAGES AND LOST PROFITS	5.6	3,024.00
2/16/21	DWW	RESEARCH [REDACTED]; RESEARCH REGARDING [REDACTED]; RESEARCH REGARDING [REDACTED]; RESEARCH REGARDING [REDACTED]; REVIEW/ANALYZE CASES CITED IN PLAINTIFF'S 12B6 MOTION	3.5	1,890.00
2/16/21	KP	REVIEW/ANALYSIS OF COURT ORDER SETTING TELEPHONIC HEARING ON DISCOVERY DISPUTE; PREPARE CORRESPONDENCE TO G. WANG [REDACTED]; REVIEW EMAIL CORRESPONDENCE REGARDING CALCULATION OF DAMAGES AND LOANS VS INVESTMENT ISSUES; REVIEW AND RESPOND TO CORRESPONDENCE REGARDING FORENSIC COLLECTION; REVIEW CORRESPONDENCE FROM COUNSEL FOR QUINTARA SEEKING TO CONTINUE TELEPHONIC HEARING ON DISCOVERY DISPUTE.	2.3	1,426.00
2/16/21	TN	QUERY, EXPORT AND COPY QB DOCUMENTS TO NETWORK PER T. NG; EMAIL CORRESPONDENCE WITH T. NG.	1.0	175.00
2/17/21	BMC	SPEAK WITH CLIENT RE [REDACTED]; CONTINUE TO PREPARE DOCUMENT LOG; CONSIDER DAMAGES ISSUES; MANAGE DOCUMENT COLLECTION ISSUES; REVIEW COURT ORDERS	5.2	1,898.00
		DRAFT OPPOSITION TO QUINTARA'S MOTION TO DISMISS; RESEARCH [REDACTED]; RESEARCH [REDACTED]		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	2/28/21 1061912 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
2/17/21	DWW	PREPARATION OF RESPONSE TO QUINTARA'S COUNSEL'S REQUEST FOR EXTENSION REGARDING FEBRUARY 24, 2021 HEARING; REVIEW EMAIL CORRESPONDENCE FROM T. NG REGARDING G. WANG IMAGING OF COMPUTER; REVIEW AND RESPOND TO TRANSLATOR'S INTERPRETATION OF COOPERATION AGREEMENT.	5.9	3,186.00
2/17/21	TN	FURTHER CONSIDER TRANSLATION AND DISCOVERY ISSUES; DISCUSS ISSUES WITH CLIENT	.7	434.00
2/18/21	BMC	REVIEW/ANALYZE QUINTARA'S MOTION TO STRIKE AND REVIEW ALLEGATIONS IN COUNTERCLAIM QUINTARA SEEKS TO STRIKE; DRAFT/REVISE OPPOSITION TO MOTION TO DISMISS AND MOTION TO STRIKE; COMMUNICATIONS WITH D. WISEMAN REGARDING OPPOSITION BRIEF; REVIEW COMMUNICATIONS FROM T. NG REGARDING RUIFENG'S DAMAGES; REVIEW/ANALYZE DOCUMENTS PRODUCED BY QUINTARA	1.8	657.00
2/18/21	DWW	PREPARATION FOR AND TELEPHONE CONFERENCE REGARDING [REDACTED] RUIFENG AND G. WANG WITH G. WANG AND T. NG; REVIEW AND RESPOND TO EMAIL MESSAGES FROM COUNSEL FOR QUINTARA REGARDING NO STIPULATION TO MOVE FEBRUARY 24, 2021 DISCOVERY HEARING; REVIEW QUINTARA'S MOTION TO DISMISS AND MOTION TO STRIKE; REVIEW DRAFT OPPOSITION BRIEF.	4.5	2,430.00
2/18/21	TN	PARTICIPATE IN CLIENT CONFERENCE CALL; HANDLE VARIOUS LITIGATION TASKS RELATED TO DISCOVERY; REVIEW AND EDIT OPPOSITION TO MOTION TO STRIKE	4.1	2,542.00
2/19/21	BMC	REVIEW QUINTARA'S MOTION TO CONTINUE DISCOVERY HEARING; DRAFT OPPOSITION TO PLAINTIFF'S MOTION TO CONTINUE DISCOVERY HEARING; DRAFT/REVISE OPPOSITION TO MOTION TO DISMISS; COMMUNICATIONS WITH D. PETERSON REGARDING DISCOVERY HEARING ON 2/24; COMMUNICATIONS WITH T. NG REGARDING LOANS MADE TO QUINTARA; REVIEW TRANSLATED DOCUMENTS FROM T. NG FOR AMENDED COUNTERCLAIM	2.9	1,058.50
2/19/21	DWW	EMAIL FROM COUNSEL FOR QUINTARA REGARDING EXTENSION OF FEBRUARY 24, 2021 HEARING; PREPARE RESPONSE; REVIEW, REVISE AND EDIT OPPOSITION TO MOTION TO DISMISS AND MOTION TO STRIKE; REVIEW QUINTARA'S MOTION TO CONTINUE FEBRUARY 24, 2021 HEARING; PREPARE WISEMAN DECLARATION REGARDING QUINTARA'S MOTION CONTINUE FEBRUARY 24, 2021 HEARING; REVIEW SCHEDULING ORDER.	2.9	1,566.00
2/19/21	TN	CURSORY REVIEW OF TRANSLATED PERTINENT DOCUMENTS; REVIEW COUNSEL CORRESPONDENCE; REVIEW PLAINTIFF'S MOTION TO CONTINUE HEARING	3.3	2,046.00
2/21/21	BMC	REVIEW/ANALYZE QUINTARA'S RESPONSE TO RULE 34 DISCOVERY LETTER; COMMUNICATIONS WITH D. WISEMAN REGARDING RESPONSE; DRAFT/REVISE OPPOSITION TO QUINTARA'S MOTION TO DISMISS	.9	328.50
2/22/21	BMC	REVIEW/ANALYZE DOCUMENTS PRODUCED BY QUINTARA; DRAFT SUMMARY OF KEY DOCUMENTS	1.4	756.00
2/22/21	DWW	REVIEW/ANALYSIS OF CHRONOLOGY FROM B. CARR AND T. NG; BEGIN TO PREPARE OUTLINE FOR SUMMARY ADJUDICATION OF PUNITIVE DAMAGES CLAIM.	3.8	2,052.00
2/22/21	TN	REVIEW PLAINTIFF'S DISCOVERY RESPONSE AND CONSIDER DAMAGES ISSUES; REVIEW COURT ORDER; SPEAK WITH TRANSLATOR RE	2.4	1,488.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		2/28/21 1061912 5
				Page
Date	Tkpr	Description of Services Rendered	Hours	Amount
2/23/21	BMC	COOPERATION AGREEMENT TRANSLATION	1.4	511.00
2/23/21	BMC	MEET AND CONFER WITH D. PETERSON REGARDING RESPONSES TO REQUESTS FOR ADMISSIONS, AMENDED DISCOVERY RESPONSES AND SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH D. WISEMAN REGARDING ADDITIONAL DISCOVERY; COMMUNICATIONS WITH T. NG REGARDING ZHAO DISCOVERY; REVIEW/ANALYZE QUINTARA'S SPREADSHEET REGARDING PAYMENTS TO RUIFENG	.9	486.00
2/23/21	BMC	DRAFT REQUESTS FOR ADMISSION, SET TWO TO QUINTARA	1.7	918.00
2/23/21	DWW	PREPARATION FOR HEARING ON MOTION TO DISMISS; RESEARCH REGARDING [REDACTED]	2.1	1,302.00
2/23/21	TN	DISCUSS LITIGATION ISSUES WITH CLIENT; PROVIDE UPDATE TO THE TEAM RE DISCOVERY	.8	292.00
2/24/21	BMC	DRAFT/REVISE REQUESTS FOR ADMISSIONS SET TWO; REVIEW/ANALYZE MISSING DOCUMENTS FROM PRODUCTION; DRAFT SPECIAL INTERROGATORIES SET TWO TO QUINTARA; REVIEW DISCOVERY FOR TRADE SECRET RELATED REQUESTS MEET AND CONFER WITH D. PETERSON REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH D. WISEMAN REGARDING PLAINTIFF'S AMENDED RESPONSES AND BELATED TRADE SECRET DOCUMENT PRODUCTION	4.5	2,430.00
2/24/21	BMC	DRAFT LETTER TO D. PETERSON REGARDING IMPROPER BELATED TRADE SECRET DOCUMENT PRODUCTION	1.4	756.00
2/24/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE WITH COUNSEL FOR QUINTARA OFFERING TO PRODUCE TRADE SECRETS RECORDS; TELEPHONE CONFERENCE WITH B. CARR REGARDING DEFECTS WITH PROPOSAL; PREPARE OUTLINE FOR RESPONSE LETTER.	1.7	1,054.00
2/24/21	TN	MANAGE DISCOVERY ISSUES	.2	73.00
2/25/21	BMC	FINALIZE LETTER TO D. PETERSON REGARDING IMPROPER SUPPLEMENTAL TRADE SECRET DOCUMENT; DRAFT/REVISE REQUESTS FOR ADMISSION SET TWO; REVIEW LOCAL RULES REGARDING REQUESTS FOR ADMISSION	1.1	594.00
2/25/21	DWW	REVIEW/REVISION OF LETTER TO COUNSEL FOR QUINTARA REGARDING OFFER TO PRODUCE TRADE SECRETS; REVIEW, REVISE AND EDIT REQUESTS FOR ADMISSION (SET TWO) AND SPECIAL INTERROGATORIES (SET ONE); REVIEW EMAIL FROM T. NG REGARDING FACTUAL ISSUES WITH MR. WANG.	2.7	1,674.00
2/25/21	TN	MANAGE DISCOVERY ISSUES; DISCUSS WITH CLIENT RE [REDACTED]	1.3	474.50
2/26/21	BMC	REVIEW TRANSLATED DOCUMENTS FROM QUINTARA'S DOCUMENT PRODUCTION	.6	324.00
2/26/21	DWW	PREPARATION FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH G. WANG AND T. NG REGARDING [REDACTED]		
		[REDACTED] REVIEW AND RESPOND TO EMAIL MESSAGE FROM COUNSEL FOR QUINTARA REGARDING WITHDRAWING DOCUMENT PRODUCTION FOR TRADE SECRETS.	1.4	868.00
2/26/21	TN	PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT; IDENTIFY POSSIBLE FORENSIC ACCOUNTANT	.9	328.50

Date	Description of Disbursement	CheckNo	Units	Amount
2/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	2/28/21 1061912 Page 6
-----------------	---------	---	------------------------------

Date	Description of Disbursement	CheckNo	Units	Amount
	PERFORMED BY WISEMAN,DYLAN ON 01/20/21	586691		15.24

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	78.0	540.00	42,120.00
ANTOINETTE N. JOHNSON	3.3	150.00	495.00
DYLAN WISEMAN	30.2	620.00	18,724.00
NILI YAVIN	.8	185.00	148.00
KEVIN PARKER	8.9	175.00	1,557.50
TIFFANY NG	34.4	365.00	12,556.00
Total	155.6		75,600.50

Total Fees	75,600.50
Total Disbursements	15.24

Matter Total	\$ 75,615.74
---------------------	---------------------

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

March 31, 2021
Invoice No. 1068396

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	203,704.61
Payments received through 04/15/21	145,000.00-
Previous Balance Remaining	58,704.61
Current Fees Through 03/31/21	108,176.50
Current Disbursements Through 03/31/21	487.65
Invoice Total	\$ 108,664.15
Balance Due	\$ 167,368.76

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
58,704.61	.00	.00	167,368.76

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		3/31/21 1068396 Page 1
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/01/21	BMC	REVIEW/ANALYZE REPLY IN SUPPORT OF MOTION TO DISMISS; REVIEW/ANALYZE AUTHORITIES CITED IN REPLY	1.5	810.00
3/01/21	BMC	DRAFT RULE 26 SUPPLEMENTAL DISCLOSURES; REVIEW/ANALYZE COUNTERCLAIM FOR DAMAGES FOR AMENDED DISCLOSURES; REVIEW/ANALYZE DAMAGE CALCULATION SPREADSHEET FOR SUPPLEMENTAL DISCLOSURES; COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S SUPPLEMENTAL TRADE SECRET DOCUMENT PRODUCTION; REVIEW/ANALYZE PLAINTIFF'S SUPPLEMENTAL DISCOVERY RESPONSES TO REQUESTS FOR PRODUCTION (SET ONE); COMMUNICATIONS WITH D. WISEMAN REGARDING SUPPLEMENTAL DISCOVERY RESPONSES; COMMUNICATIONS WITH D. WISEMAN REGARDING AMENDED DISCLOSURES; REVIEW DOCKET REGARDING PRE-TRIAL DEADLINES AND ANALYZE ADDITIONAL DISCOVERY NEEDED; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	4.6	2,484.00
3/01/21	DWW	REVIEW/ANALYSIS OF DAMAGES BASED ON RATE DIFFERENTIAL CALCULATION; EMAIL AND TELEPHONE CALL TO B. CARR REGARDING SAME.	.4	248.00
3/01/21	TN	CONSIDER ISSUES RELATED TO FORENSIC ACCOUNTANT; REVIEW LITIGATION TEAM CORRESPONDENCE RE NEXT STEPS IN LEGAL STRATEGY; REVIEW REPLY TO MOTION TO DISMISS; REVIEW CLIENT CORRESPONDENCE	.9	328.50
3/01/21	TN	***NO CHARGE***: (NO CHARGE) HANDLE ISSUES RELATED TO TRANSLATION	.2	
3/02/21	BMC	REVIEW DISCOVERY FOR INTERROGATORIES ABOUT TANGIBLE ASSETS AND INTERFERENCE WITH PROSPECTIVE ECONOMIC RELATIONS; REVIEW QUINTARA'S COMPLAINT REGARDING PROSPECTIVE ECONOMIC RELATIONS; REVIEW COMMUNICATIONS WITH D. WISEMAN REGARDING ADDITIONAL DISCOVERY ON TANGIBLE ASSETS AND QUINTARA'S INTERFERENCE CLAIM	.5	270.00
3/02/21	DWW	REVIEW/ANALYSIS OF REPLY TO OPPOSITION TO DISMISS COUNTERCLAIM,	.6	372.00
3/02/21	TN	DISCUSS LITIGATION STATUS WITH CLIENT; HANDLE DISCOVERY ISSUES	.5	182.50
3/03/21	BMC	DRAFT REQUESTS FOR PRODUCTION (SET TWO); DRAFT SPECIAL INTERROGATORIES (SET THREE); COMMUNICATIONS WITH D. WISEMAN REGARDING EXPERT WITNESSES; REVIEW/ANALYZE AUTHORITIES CITED BY PLAINTIFF IN REPLY TO MOTION TO DISMISS; REVIEW/ANALYZE AMENDED COMPLAINT REGARDING INTERFERENCE WITH CUSTOMERS AND PROSPECTIVE ECONOMIC ADVANTAGE	3.8	2,052.00
3/03/21	DWW	REQUEST FOR PRODUCTION (SET TWO) AND SPECIAL INTERROGATORIES (SET TWO); REVIEW CALCULATIONS REGARDING RATE DIFFERENTIAL DAMAGES.	2.3	1,426.00
3/03/21	TN	CONSIDER DISCOVERY ISSUES AND OTHER LITIGATION TASKS; REVIEW AMENDED DISCLOSURE	.5	182.50
3/04/21	DWW	TELEPHONE CONFERENCE WITH G. WANG REGARDING [REDACTED]		
		[REDACTED] FOR AND PARTICIPATE IN CLIENT CONFERENCE CALL	.8	292.00
3/05/21	DWW	REVIEW/ANALYSIS OF UPDATED CV FOR M. SEBOLD; PREPARE FOR DISCOVERY HEARING AND MOTION TO DISMISS.	1.3	806.00
3/05/21	KB	PROOFREAD OPPOSITION TO MOTION TO DISMISS COMPLAINT.	.9	58.50
3/05/21	TN	MANAGE ISSUES RELATED TO ON SITE EVIDENCE PRESERVATION	.3	109.50
3/08/21	DWW	PREPARATION FOR HEARING ON MOTION TO STRIKE/DISMISS AND REVIEW BOTH SIDES' MOVING PAPERS.	2.7	1,674.00
3/08/21	TN	SPEAK WITH CLIENT RE [REDACTED]; REVIEW DISCOVERY RELATED		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	3/31/21 1068396 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
		CORRESPONDENCE	.3	109.50
3/09/21	DWW	CORRESPONDENCE WITH T. NG AND B. CARR REGARDING AMENDED RULE 26 DISCLOSURE.	.3	186.00
3/09/21	TN	REVIEW CORRESPONDENCE RE LITIGATION AND DISCOVERY STATUS; SPEAK WITH CLIENT RE [REDACTED]	.9	328.50
3/10/21	DWW	REVIEW/ANALYSIS OF REVIEW AND EDIT AMENDED RULE 26 DISCLOSURES; EMAIL CORRESPONDENCE WITH T. NG REGARDING DAMAGES CALCULATIONS FROM OWNERSHIP AND LOST PROFITS FROM RATE DIFFERENTIAL; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING ACCEPTING SERVICE AND SHARP PRACTICES.	2.4	1,488.00
3/10/21	TN	REVIEW CORRESPONDENCE RELATED TO SERVICE ISSUES	.2	73.00
3/11/21	BMC	COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING RUIFENG'S DAMAGES; COMMUNICATIONS WITH D. WISEMAN REGARDING SITE INSPECTION; COMMUNICATIONS WITH D. WISEMAN REGARDING AMENDED RULE 26 DISCLOSURES; DRAFT INSPECTION DEMAND TO PHOTOGRAPH QUINTARA'S OFFICE	1.9	1,026.00
3/11/21	DWW	REVIEW/ANALYSIS OF AMENDED RULE 26 INITIAL DISCLOSURE; REVIEW EMAIL FROM T. NG REGARDING CALCULATION OF PERCENTAGE MONIES UNDER THE COLLABORATION AGREEMENT; REVIEW AND EDIT REQUEST TO INSPECT QUINTARA OFFICE; PREPARE FOR HEARING ON MARCH 18, 2021 ON MOTIONS TO DISMISS; REVIEW COURT RULING REGARDING SAME.	1.7	1,054.00
3/11/21	TN	CONSIDER DAMAGES ISSUES; CORRESPOND WITH CLIENT RE [REDACTED]	.9	328.50
3/12/21	BMC	REVIEW COMMUNICATIONS FORM T. NG REGARDING RUIFENG'S DAMAGES; RESEARCH REGARDING [REDACTED]; ANALYZE ADDITIONAL DISCOVERY TO PROPOUND ON COUNTER-DEFENDANTS	.9	486.00
3/12/21	BMC	CONFERENCE WITH G. ZWANG REGARDING APPEAL OUTLINE AND EVIDENCE CODE SECTION 622 CASES	1.5	810.00
3/12/21	DWW	PREPARATION FOR FOR HEARING ON MARCH 18, 2021 REGARDING DEFENDANTS' MOTION TO STRIKE OR DISMISS; PLAINTIFFS' RULE 12(B)(6) MOTION TO COUNTERCLAIM AND DISCOVERY MOTION.	3.1	1,922.00
3/12/21	TN	REVIEW CORRESPONDENCE AND DOCUMENTS FROM THE CLIENT RE [REDACTED] PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT	1.5	547.50
3/13/21	BMC	REVIEW/ANALYZE ORDER ON MOTION TO STRIKE QUINTARA'S TRADE SECRET CLAIM; COMMUNICATIONS WITH D. WISEMAN REGARDING ADDITIONAL DISCOVERY ON REMAINING TRADE SECRETS	.4	216.00
3/13/21	DWW	REVIEW/ANALYSIS OF COURT'S MARCH 13, 2021 RULING STRIKING DNA SEQUENCING TRADE SECRETS.	.6	372.00
3/13/21	TN	REVIEW COURT ORDER RE MOTION TO STRIKE	.3	109.50
3/15/21	BMC	REVIEW COMMUNICATIONS REGARDING DISCOVERY AND DEPOSITIONS BETWEEN D. WISEMAN AND J. LI (MULTIPLE EXCHANGES); CONFERENCE WITH D. WISEMAN REGARDING ADDITIONAL DISCOVERY ON TRADE SECRET ISSUES AND SUMMARY JUDGMENT; COMMUNICATIONS WITH T. NG REGARDING DEPOSITIONS; REVIEW TRADE SECRET LAW REGARDING CUSTOMER LISTS; REVIEW ORDER GRANTING MOTION TO STRIKE; COMMUNICATIONS WITH D. PETERSON REGARDING QUINTARA'S DISCOVERY RESPONSES; REVIEW DRAFT AMENDED DISCLOSURE; RESEARCH REGARDING [REDACTED]		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		3/31/21 1068396 3
			Page	
Date	Tkpr	Description of Services Rendered	Hours	Amount
			3.5	1,890.00
3/15/21	DWW	PREPARATION FOR DEPOSITIONS.	3.4	2,108.00
3/15/21	TN	REVIEW VARIOUS CORRESPONDENCE RE DISCOVERY ISSUES; PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT; REVIEW PLAINTIFF'S WRITTEN DISCOVERY	1.8	657.00
3/16/21	BMC	REVIEW/ANALYZE QUINTARA'S DEMAND FOR INSPECTION, SET ONE; REVIEW/ANALYZE RESPONSES TO REQUESTS FOR ADMISSIONS, SET ONE; REVIEW/ANALYZE QUINTARA'S DEPOSITION NOTICES; COMMUNICATIONS WITH A. SMITH REGARDING DISCOVERY ON CROSS-DEFENDANTS; REVIEW/ANALYZE PREVIOUS DISCOVERY AND RESPONSES REGARDING TRADE SECRET CLAIMS; ANALYZE ADDITIONAL DISCOVERY NEEDED FOR QUINTARA'S REMAINING TRADE SECRET CLAIMS; REVIEW/ANALYZE AMENDED TRADE SECRETS DISCLOSURE	3.8	2,052.00
3/16/21	DWW	PREPARATION FOR TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTARA; TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTRA; EMAIL COUNSEL FOR QUINTARA REGARDING DEPOSITIONS AND DISCOVERY.	1.1	682.00
3/16/21	TN	REVIEW CLIENT CORRESPONDENCE RE TRADE SECRETS; REVIEW COUNSEL CORRESPONDENCE RE DISCOVERY ISSUES	.7	255.50
3/17/21	BMC	DRAFT REQUESTS FOR PRODUCTION OF DOCUMENTS, SET THREE; DRAFT SPECIAL INTERROGATORIES, SET FOUR; REVIEW ORDER FROM JUDGE REGARDING REMAINING TRADE SECRET CLAIMS; REVIEW FIRST AMENDED COMPLAINT REGARDING TRADE SECRET CLAIMS; DRAFT OBJECTIONS TO REQUESTS FOR INSPECTION, SET ONE; CONFERENCE WITH D. WISEMAN REGARDING DEPOSITIONS, SUMMARY JUDGMENT AND DISCOVERY	5.8	3,132.00
3/17/21	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING DEPOSITIONS; PREPARE FOR SHAN AND ZHAO DEPICTIONS; TELEPHONE CONFERENCE WITH G. WANG A. WONG AND T. NG REGARDING [REDACTED]		
		[REDACTED] CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING VIDEOTAPING DEPOSITIONS.	4.7	2,914.00
3/17/21	TN	REVIEW CLIENT DOCUMENTS; CORRESPOND WITH LITIGATION TEAM RE FACTS AND LITIGATION STRATEGY; PARTICIPATE IN CLIENT CONFERENCE CALL; [REDACTED]	4.1	1,496.50
3/18/21	BMC	REVIEW/ANALYZE QUINTARA'S DISCOVERY RULE 34 MOTION; DRAFT/REVISE REQUESTS FOR PRODUCTION TO QUINTARA SET THREE; DRAFT/REVISE SPECIAL INTERROGATORIES, SET FOUR; DRAFT/REVISE OBJECTIONS TO QUINTARA'S INSPECTION DEMAND; COMMUNICATIONS WITH D. WISEMAN REGARDING SUMMARY JUDGMENT ISSUES, QUINTARA'S DATABASES AND DISCOVERY; REVIEW QUINTARA'S PMK DEPOSITION NOTICES; REVIEW RUIFENG'S RESPONSE TO RULE 34 MOTION; REVIEW ORDER FROM COURT REGARDING DISCOVERY HEARING; RESEARCH [REDACTED]		
		[REDACTED]	5.5	2,970.00
3/18/21	DWW	REVIEW/ANALYSIS OF PREPARE RESPONSE TO JANUARY 17, 2020 DISCOVERY LETTER; RESEARCH REGARDING [REDACTED]; REVIEW AND RESPOND TO EMAIL REGARDING RULE 30(B)(6) DEPOSITIONS; TELEPHONE CONFERENCE WITH B. CARR REGARDING DEMAND FOR DATABASES; REVIEW, REVISE AND EDIT SPECIAL INTERROGATORIES AND INSPECTION DEMANDS; REVISE AND EDIT LETTER TO JUDGE ALISO REGARDING DISCOVERY DISPUTE; PREPARE OUTLINE FOR DEPOSITIONS.	6.1	3,782.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		3/31/21 1068396 Page 4
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/18/21	TN	REVIEW VARIOUS CORRESPONDENCE RE DISCOVERY AND RELEVANT COURT ORDER; REVIEW CLIENT CORRESPONDENCE	.8	292.00
3/19/21	BMC	REVIEW/ANALYZE QUINTARA'S RESPONSES TO REQUESTS FOR ADMISSION, SET ONE; REVIEW/ANALYZE QUINTARA'S RESPONSES TO SPECIAL INTERROGATORIES, SET ONE; MEET AND CONFER WITH D. PETERSON ON DEFICIENT TRADE SECRET RESPONSES; RESEARCH [REDACTED]		
		[REDACTED]	2.5	1,350.00
3/19/21	DWW	PREPARATION FOR QUINTARA DEPOSITIONS.	2.1	1,302.00
3/19/21	TN	SPEAK WITH CLIENT RE [REDACTED]; PREPARE DISCOVERY RESPONSES		
		[REDACTED]	1.9	693.50
3/22/21	BMC	RESEARCH REGARDING [REDACTED]		
		[REDACTED]		
		[REDACTED]; PREPARE FOR MEET AND CONFER WITH D. PETERSON REGARDING DEFENDANTS' OBJECTIONS TO INSPECTION DEMANDS AND PLAINTIFF'S RESPONSES TO SPECIAL INTERROGATORIES; MEET AND CONFER WITH D. PETERSON REGARDING SAME; DRAFT SUMMARY OF ISSUES AGREED TO DURING MEET AND CONFER; REVIEW PRODUCTION LETTER FROM D. PETERSON; COORDINATE TRADE SECRET PRODUCTION UPLOAD TO RELATIVITY AND FILESITE; REVIEW MEETING SUMMARY REGARDING VENDORS AND CUSTOMERS FROM T. NG	4.4	2,376.00
3/22/21	DWW	PREPARATION FOR DEPOSITIONS OF S. ZHAO AND R. CHAN.	5.2	3,224.00
3/22/21	AG	STAGE DOCUMENT PRODUCTION FOR ATTORNEY REVIEW PER D. WISEMAN REQUEST;	1.0	185.00
3/22/21	TN	REVIEW CORRESPONDENCE RE DATABASE ISSUES AND CONSIDER LITIGATION STRATEGIES; PARTICIPATE IN CLIENT CONFERENCE CAL; [REDACTED]		
		[REDACTED]	3.2	1,168.00
3/22/21	TN	REVIEW QUINTARA'S TRADE SECRET DOCUMENT PRODUCTION	1.2	438.00
3/23/21	BMC	REVIEW/ANALYZE QUINTARA'S TRADE SECRET DOCUMENT PRODUCTION; CONFERENCE WITH D. WISEMAN AND T. NG REGARDING PRODUCTION; REVIEW/ANALYZE AMENDED TRADE SECRET DISCLOSURE	6.5	3,510.00
3/23/21	DWW	PREPARATION FOR FOR DEPOSITION OF R. SHAN AND S. ZHAO.	7.4	4,588.00
3/23/21	KP	UPLOAD OPPOSING COUNSEL PRODUCTION QB002 TO RELATIVITY; EMAIL CORRESPONDENCE WITH B. CARR.	3.0	525.00
3/23/21	TN	REVIEW QUINTARA'S DOCUMENT PRODUCTION; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; REVIEW CORRESPONDENCE WITH OPPOSING COUNSEL RE DISCOVERY ISSUES; SPEAK WITH CLIENT RE [REDACTED]		
		[REDACTED]	4.9	1,788.50
3/24/21	BMC	REVIEW/ANALYZE QUINTARA'S TRADE SECRET DOCUMENT PRODUCTION; REVIEW COMMUNICATIONS WITH D. PETERSON REGARDING QUINTARA'S ALLEGED TRADE SECRETS; RESEARCH REGARDING [REDACTED]		
		[REDACTED]		
		[REDACTED]; CONFERENCE CALL WITH HAYSTACK REGARDING DOCUMENT PRODUCTION; CONFERENCE WITH D. WISEMAN REGARDING SUMMARY ADJUDICATION MOTION	4.6	2,484.00
3/24/21	DWW	PREPARATION FOR CONFERENCE WITH JUDGE ALSUP; CONFERENCE CALL REGARDING DISCOVERY DISPUTE WITH JUDGE ALSUP; REVIEW AND ANALYZE DOCUMENTS PRODUCED BY QUINTARA; TELEPHONE CONFERENCE WITH G. WANG AND T. NG REGARDING [REDACTED];		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	3/31/21 1068396 5	
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/24/21	KP	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING SAME; CONFERENCE CALL WITH FORENSIC VENDOR REGARDING PRESENCE OR ABSENCE OF CERTAIN FILES; REVIEW PRODUCTION FROM QUINTARA OF THE CLIENT PROFILE AND VENDOR DATABASES.	5.6	3,472.00
3/24/21	TN	CONVERT OPPOSING PRODUCTION QB002 AND QB003 IMAGES AND UPLOAD TO RELATIVITY; EMAIL CORRESPONDENCE WITH B. CARR AND D. WISEMAN; DOWNLOAD, EXTRACT. TROUBLESHOOT AND UPLOAD OPPOSING COUNSEL PRODUCTION QB003 TO RELATIVITY; PROVIDE QB EMAIL REPORTS PER D. WISEMAN.	7.0	1,225.00
3/24/21	TN	PARTICIPATE IN DISCOVERY HEARING; REVIEW DISCOVERY REQUESTS; CONSIDER NEXT STEPS IN LITIGATION; PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT	2.8	1,022.00
3/25/21	BMC	PREPARE DRAFT RESPONSES TO REQUESTS FOR ADMISSIONS COMMUNICATIONS WITH D. WISEMAN REGARDING HAYSTACK DOCUMENT REVIEW; COMMUNICATIONS WITH D. SCHUH AT HAYSTACK REGARDING STIPULATED PROTECTIVE ORDER; REVIEW/ANALYZE CASES WHERE TRADE SECRET DISMISSED ON SUMMARY JUDGMENT; REVIEW QUINTARA'S REVISED DISCOVERY TO RUIFENG; COMMUNICATIONS WITH D. WISEMAN REGARDING OBJECTIONS TO QUINTARA'S DEPO NOTICES AND SERVING AMENDED DEPO NOTICES	1.8	657.00
3/25/21	DWW	READ EMAIL FROM NG, TIFFANY F.: FW: ACTIVITY IN CASE 3:20-CV-04808-WHA QUINTARA BIOSCIENCES, INC. V. RUIFENG BIZTECH INC. ET AL. DISCOVERY HEARING [IWOV-BN.FID3231313]	2.5	1,350.00
3/25/21	DWW	REVIEW/REVISION OF DEFENDANTS' WRITTEN DISCOVERY TO QUINTARA TO INCORPORATE JUDGE ALSUP'S DEFINITION OF "CONCERNING;" REVIEW DOCUMENTS PRODUCED BY QUINTARA REGARDING THE CUSTOMER PROFILE AND VENDOR DATABASES; TELEPHONE CONFERENCE WITH M. SEBOLD REGARDING RETENTION AS REBUTTAL EXPERT; REVIEW PROPOSED DATES FOR DEPOSITIONS; EMAIL MESSAGES TO G. WANG REGARDING 1 [REDACTED]; PREPARE STRATEGY TO DEFEAT "OWNERSHIP" RELEVANCE ISSUES AND MISAPPROPRIATION OF TRADE SECRETS.	.1	62.00
3/25/21	KP	EMAIL CORRESPONDENCE WITH D. WISEMAN; PROVIDE QB EMAIL REPORTS SORTED BY DATE PER D. WISEMAN.	4.2	2,604.00
3/25/21	TN	WORK ON DISCOVERY RESPONSES; PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT; REVIEW DISCOVERY REQUESTS FROM PLAINTIFF	1.5	262.50
3/26/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING DISCOVERY, DEPOS AND HAYSTACK DOCUMENT REVIEW; REVIEW DOCKET REGARDING UPCOMING DEADLINES; REVIEW SUMMARY OF QUINTARA'S TRADE SECRET FLAWS FROM D. WISEMAN FOR SUMMARY ADJUDICATION; REVIEW HEARING TRANSCRIPT ON DISCOVERY MOTION	3.9	1,423.50
3/26/21	ANJ	COMPARE EXHIBIT DOCUMENT AND ADD REDACTED VERSION TO FILE FOR PRODUCTION	.9	486.00
3/26/21	DWW	REVIEW/REVISION OF DEFENDANTS' SUPPLEMENTAL RESPONSES TO REQUESTS FOR ADMISSION, SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION (SET ONE); REVIEW DOCUMENTS TO BE PRODUCED, PREPARE FOR QUINTARA DEPOSITIONS.	.2	30.00
3/26/21	TN	REVISE SUPPLEMENTAL DISCOVERY RESPONSES; REVIEW ADDITIONAL	3.6	2,232.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		3/31/21 1068396 Page 6
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/28/21	TN	WRITTEN DISCOVERY FROM PLAINTIFF; DISCUSS DISCOVERY ISSUES WITH VENDOR AND CLIENT; REVIEW DOCUMENTS FOR PRODUCTION	5.7	2,080.50
3/28/21	TN	SPEAK WITH CLIENT RE [REDACTED]; REVIEW CLIENT CORRESPONDENCE	.9	328.50
3/28/21	TN	REVISE DISCOVERY RESPONSES; MANAGE DOCUMENT PRODUCTION; REVIEW CLIENT DOCUMENTS	2.8	1,022.00
3/29/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING AMENDED DEPOSITION NOTICES; DRAFT AMENDED DEPO NOTICES FOR X. ZHAO AND Q. SHAN; REVIEW/ANALYZE NINTH CIRCUIT AUTHORITIES REGARDING DISMISSING TRADE SECRET CLAIM ON SUMMARY JUDGMENT; RESEARCH REGARDING [REDACTED]; REVIEW PLAINTIFF'S REVISED DEPOSITION NOTICES FOR DEFENDANTS; COMMUNICATIONS WITH T. NG REGARDING QUINTARA'S DOCUMENT PRODUCTION AND DEPOSITION ISSUES; COMMUNICATIONS WITH D. PETERSON REGARDING TRANSLATOR ISSUES AND DEPOSITION SCHEDULING; DRAFT 30B6 DEPOSITION NOTICE TO QUINTARA; COMMUNICATIONS WITH T. NG REGARDING QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION	4.9	2,646.00
3/29/21	ANJ	REVIEW, ANALYZE AND REDACT UNRELATED INFORMATION AND ACCOUNT NUMBERS FROM FINANCIAL RECORDS AND FINALIZE DOCUMENTS FOR PRODUCTION.	4.9	735.00
3/29/21	DWW	REVIEW/REVISION OF REVIEW AND EDIT DISCOVERY RESPONSES; PREPARE OUTLINE FOR SUMMARY ADJUDICATION MOTION; PREPARE, REVISE AND EDIT OUTLINE FOR QUINTARA DEPOSITIONS.	4.7	2,914.00
3/29/21	KP	EMAIL CORRESPONDENCE WITH T. NG; PROCESS AND PRODUCE CLIENT PRODUCTION RUIFEN001 AND UPLOAD TO SHAREFILE FOR TRANSFER.	2.5	437.50
3/29/21	TN	WORK ON DOCUMENT PRODUCTION	4.6	1,679.00
3/29/21	TN	REVIEW QUINTARA'S THIRD DOCUMENT PRODUCTION	1.2	438.00
3/30/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING DEPOSITIONS; COMMUNICATIONS WITH D. WISEMAN REGARDING ADDITIONAL DISCOVERY FOR SUMMARY ADJUDICATION MOTION; DRAFT/REVISE 30B6 DEPOSITION NOTICE TO QUINTARA; DRAFT REQUEST FOR PRODUCTION OF DOCUMENTS, SET FOUR; COMMUNICATIONS WITH D. WISEMAN REGARDING INSPECTION OF RUIFENG'S COMPUTERS; REVIEW/ANALYZE AUTHORITIES REGARDING TURNOVER OF COMPUTERS ONLY IF BAD FAITH DEMONSTRATED DURING DISCOVERY; COMMUNICATIONS WITH D. PETERSON REGARDING RUIFENG'S DOCUMENT PRODUCTION; REVIEW/ANALYZE QUINTARA'S RESPONSES TO INTERROGATORIES, SET TWO; REVIEW/ANALYZE QUINTARA'S RESPONSES TO REQUESTS FOR ADMISSION, SET TWO; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO INTERROGATORIES, SET ONE; COMMUNICATIONS WITH D. WISEMAN REGARDING DEFICIENCIES WITH QUINTARA'S DISCOVERY RESPONSES	4.6	2,484.00
3/30/21	DWW	REVIEW/ANALYSIS OF RESPONSES TO WRITTEN DISCOVERY; ADDITIONAL REQUESTS FOR PRODUCTION OF DOCUMENTS TO QUINTARA; PREPARE FOR DEPOSITIONS; PREPARE AND EDIT OUTLINE FOR PARTIAL SUMMARY JUDGMENT MOTION; EMAILS AND TELEPHONE CONFERENCE WITH T. NG.		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	3/31/21 1068396 7	
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/30/21	KP	REGARDING DISCOVERY AND PRODUCTION ISSUES; REVIEW AND RESPOND TO EMAIL CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING REQUEST FOR FORENSIC IMAGING.	5.3	3,286.00
3/30/21	TN	STAGE CLIENT DATA, PROCESS AND UPLOAD TO RELATIVITY; PREPARE AND PRODUCE CLIENT PRODUCTION RUIFENG001 WITHIN RELATIVITY; EMAIL CORRESPONDENCE WITH T. NG; REVIEW OPPOSING COUNSEL PRODUCED SQL FILES.	3.0	525.00
3/31/21	BMC	REVIEW DISCOVERY RESPONSES; CONSIDER DISCOVERY STRATEGY; REVIEW PLAINTIFF'S CORRESPONDENCE; CREATE GLOSSARY; RESOLVE DEPOSITION ISSUES	2.5	912.50
3/31/21	ANJ	DRAFT/REVISE REQUESTS FOR PRODUCTION, SET FOUR; DRAFT/REVISE 30B6 DEPOSITION NOTICE TO QUINTARA; RESEARCH [REDACTED]; RESEARCH REGARDING [REDACTED]; COMMUNICATIONS WITH D. WISEMAN REGARDING MEET AND CONFER ON QUINTARA'S RESPONSES TO SPECIAL INTERROGATORIES; REVIEW/ANALYZE QUINTARA'S RESPONSE TO REQUESTS FOR ADMISSIONS; REVIEW/ANALYZE PLAINTIFF'S TRADE SECRET DOCUMENTS FOR SUMMARY ADJUDICATION MOTION	2.6	1,404.00
3/31/21	DWW	REVIEW AND ANALYZE DOCUMENT PRODUCTION AND GROUP DOCUMENTS. REVIEW/ANALYSIS OF AND REVIEW AND EDIT OUTLINE FOR DEPOSITIONS; FINALIZE RULE 30(B)(6) DEPOSITION NOTICE; REVIEW AND RESPOND TO EMAIL MESSAGES REGARDING COMPUTER FORENSICS; REVIEW AGENDA FROM T. NG FOR CALL WITH B. WANG; CONTINUE TO REVIEW PRODUCED DOCUMENT AND PREPARE FOR DEPOSITIONS.	2.4	360.00
3/31/21	TG	PREPARATION OF PREPARE SEARCHES AND EXPORT DOCUMENTS FROM RELATIVITY WORKSPACE PER T. NG.	5.3	3,286.00
3/31/21	TN	CORRESPOND WITH PLAINTIFF; CONSIDER DISCOVERY ISSUES; PARTICIPATE IN CONFERENCE CALL WITH CLIENT; MEET AND CONFER WITH PLAINTIFF ON DISCOVERY ISSUES; SELECT PERTINENT DOCUMENTS FOR DEPOSITION; PREPARE DISCOVERY RESPONSES	1.1	203.50
			5.2	1,898.00

Date	Description of Disbursement	CheckNo	Units	Amount
3/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 02/09/21	587311		14.49
3/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 02/15/21	587311		310.04
3/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 02/21/21	587311		28.98
3/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 02/22/21	587311		28.98
3/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 02/23/21	587311		84.76
3/26/21	COURT REPORTER ANA M. DUB.CSR# 7445 U.S. DISTRICT COURT PAYMENT FOR TRANSCRIPT OF 3-24-21 HEARING - INV.# 20210555	587451		20.40

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	3/31/21 1068396 Page 8
-----------------	---------	---	------------------------------

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	67.2	540.00	36,288.00
ANTOINETTE N. JOHNSON	7.5	150.00	1,125.00
DYLAN WISEMAN	75.0	620.00	46,500.00
KARYN BALZARY	.9	65.00	58.50
AL GAY	1.0	185.00	185.00
TAMERA GOODMAN	1.1	185.00	203.50
KEVIN PARKER	17.0	175.00	2,975.00
TIFFANY NG	57.1	365.00	20,841.50
	.2		No Charge
Total	227.0		108,176.50

Total Fees	108,176.50
Total Disbursements	487.65

Matter Total	\$ 108,664.15
---------------------	----------------------

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

April 30, 2021
Invoice No. 1072101

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	167,368.76
Payments received through 05/10/21	60,000.00-
Previous Balance Remaining	107,368.76
Current Fees Through 04/30/21	204,413.50
Current Disbursements Through 04/30/21	1,511.56
Invoice Total	\$ 205,925.06
Balance Due	\$ 313,293.82

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
107,368.76	.00	.00	313,293.82

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/26/21	NY	CONFER WITH T. NG RE DOCUMENT COLLECTION, PROCESSING AND REVIEW PROJECT; REVIEW HAYSTACKID ESTIMATE.	.6	111.00
4/01/21	BMC	DRAFT REQUESTS FOR PRODUCTION OF DOCUMENTS, SET FIVE; REVIEW/ANALYZE DISCOVERY MOTION FILED BY QUINTARA REGARDING INSPECTION OF DEFENDANTS' COMPUTERS; COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING RESPONSE TO MOTION; REVIEW CASE LAW REGARDING INSPECTION OF COMPETITORS' COMPUTERS; REVIEW/ANALYZE NORTHERN DISTRICT RULES AND JUDGE ALSUP'S RULES REGARDING SUMMARY JUDGMENT MOTIONS; REVIEW/ANALYZE OUTLINE FORM D. WISEMAN REGARDING SUMMARY ADJUDICATION ISSUES; REVIEW TRADE SECRET DOCUMENTS FROM QUINTARA; REVIEW STATUS OF RUIFENG DOCUMENT COLLECTION MEMO FROM T. NG; COMMUNICATIONS WITH T. NG REGARDING DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR INSPECTION; DRAFT/REVISE OPPOSITION TO DEFENDANT'S DISCOVERY MOTION TO COMPEL INSPECTION	6.5	3,510.00
4/01/21	ANJ	FINALIZE REVIEW AND GROUPING OF DOCUMENT PRODUCTION.	1.1	165.00
4/01/21	DWW	PREPARATION FOR DEPOSITIONS OF QUINTARA'S PRINCIPALS; REVIEW QUINTARA'S DISCOVERY BRIEF; PREPARE AND EDIT RESPONSE; REVIEW AND EDIT DISCOVERY RESPONSES.	5.4	3,348.00
4/01/21	TG	PREPARATION OF UPDATE RELATIVITY REVIEW FIELDS THAT DISPLAY WHEN REVIEWING PER T. NG.	.8	148.00
4/01/21	TN	DISCUSS FACTUAL ISSUES WITH THE CLIENT; CONTINUE TO MANAGE DISCOVERY ISSUES AND DOCUMENT COLLECTION; PREPARE MEMO RE STATUS OF DOCUMENT COLLECTION; REVIEW QUINTARA'S DISCOVERY LETTER AND RESPONSE; DISCUSS EMAIL COLLECTION WITH HAYSTACK	3.2	1,232.00
4/01/21	TN	CONTINUE TO SELECT PERTINENT DOCUMENTS FOR DEPOSITION PREPARATION	2.2	847.00
4/02/21	BMC	REVIEW QUINTARA'S AMENDED DEPOSITION NOTICES; COMMUNICATIONS WITH D. WISEMAN REGARDING RESPONSE TO QUINTARA'S DISCOVERY MOTION; REVIEW JUDGE ALSUP'S LOCAL RULES REGARDING OPPOSITION TO QUINTARA'S DISCOVERY MOTION; COMMUNICATIONS WITH T. NG REGARDING DEFENDANTS' DOCUMENT PRODUCTION AND DAMAGES ANALYSIS; REVIEW/ANALYZE QUINTARA'S RESPONSES TO G. WANG'S SPECIAL INTERROGATORIES, SET ONE; COMMUNICATIONS WITH D. PETERSON REGARDING RESPONSES AND OBJECTIONS TO SPECIAL INTERROGATORIES, SET ONE; REVIEW CASES REGARDING DISMISSAL OF TRADE SECRET CLAIM ON SUMMARY JUDGMENT	4.5	2,430.00
4/02/21	ANJ	REVIEW AND ANALYZE DOCUMENTS AND ISOLATE PRODUCED FINANCIAL RECORDS.	3.7	555.00
4/02/21	DWW	REVIEW/ANALYSIS OF RULE 30(B)(6) DEPOSITION TOPICS; REVISE AND EDIT WRITTEN DISCOVERY; PREPARE WRITTEN DISCOVERY TO QUINTARA; PREPARE DISCOVERY LETTER; PREPARE FOR QUINTARA DEPOSITIONS.	5.3	3,286.00
4/02/21	KP	EMAIL CORRESPONDENCE WITH T. NG, A. GAY AND HAYSTACKID RE CLIENT SQL FILES; QUERY HOT DOCUMENTS PER ISSUE AND EXPORT AND STAGE TO NETWORK.	3.0	525.00
4/02/21	TN	REVIEW FINANCIAL DOCUMENTS; PARTICIPATE IN CONFERENCE CALLS WITH HAYSTACK TO RESOLVE EMAIL COLLECTION ISSUES; REVIEW PERTINENT DOCUMENTS FOR PREPARATION OF DEPOSITIONS; CONSIDER NEXT STEPS IN		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
4/02/21	TN	LITIGATION	4.8	1,848.00
4/03/21	TN	PREPARE RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS SET 3 AND RESPONSES TO FIRST SET OF REVISED INTERROGATORIES	1.9	731.50
4/05/21	BMC	CONTINUE TO WORK ON INTERROGATORY RESPONSES; CORRESPOND WITH HAYSTACK TO RESOLVE DISCOVERY ISSUES; REVIEW CLIENT CORRESPONDENCE	2.1	808.50
4/05/21	DWW	RESEARCH REGARDING [REDACTED]; COMMUNICATIONS WITH D. WISEMAN REGARDING SUMMARY ADJUDICATION MOTION AND QUINTARA'S DEFICIENT DISCOVERY RESPONSES TO SPECIAL INTERROGATORIES; PREPARATION FOR MEET AND CONFER CALL WITH D. PETERSON REGARDING RESPONSES TO SPECIAL INTERROGATORIES; RESEARCH REGARDING [REDACTED]; [REDACTED]; REVIEW/ANALYZE TRADE SECRET MISAPPROPRIATION FOR SUMMARY JUDGMENT MOTION; MEET AND CONFER WITH D. PETERSON REGARDING SPECIAL INTERROGATORY RESPONSES; RESEARCH [REDACTED]	5.8	3,132.00
4/05/21	KP	DRAFT DISCOVERY RESPONSES; PREPARE FOR DEPOSITIONS OF QUINTARA PRINCIPALS; REVISE AND EDIT OUTLINE AND HYPERLINKS REGARDING SAME. QUERY, EXPORT AND TRANSFER QUINTARA NON-AEO DOCUMENTS TO CLIENT VIA SHAREFILE; EMAIL CORRESPONDENCE WITH D. WISEMAN AND T. NG.	6.3	3,906.00
4/05/21	TN	REVIEW PLAINTIFF'S CORRESPONDENCE; CONSIDER LEGAL STRATEGY IN LIGHT OF UPCOMING DISCOVERY MOTION; RESOLVE ESI COLLECTION ISSUES	1.8	315.00
4/06/21	BMC	DRAFT RULE 34 MOTION REGARDING DEFENDANTS' DEFICIENT DISCOVERY RESPONSES TO SPECIAL INTERROGATORIES, SET ONE; RESEARCH REGARDING [REDACTED]; REVIEW HEARING TRANSCRIPT REGARDING CONTENTION INTERROGATORIES; REVIEW/REVISE AMENDED 30B6 DEPOSITION NOTICES FOR QUINTARA; COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING DEFENDANTS' DOCUMENT PRODUCTION; REVIEW CASE SETTING ORDER REGARDING DISCOVERY, EXPERT AND MOTION CUTOFFS	2.4	924.00
4/06/21	ANJ	REVIEW, ANALYZE AND TAG FINANCIAL RECORDS; FORWARD BATES RANGES TO T. NG.	5.6	3,024.00
4/06/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE TO J. ALSUP REGARDING DISCOVERY DISPUTE; PREPARE FOR HEARING ON APRIL 8, 2021 BEFORE JUDGE ALSUP; REVIEW AND EDIT WRITTEN DISCOVERY RESPONSES; PREPARE OUTLINE FOR DEPOSITIONS; REVIEW EXHIBITS AND DOCUMENTS PRODUCED.	2.7	405.00
4/06/21	TN	PREPARE DISCOVERY RESPONSES	3.1	1,922.00
4/06/21	TN	[REDACTED]; RESPOND TO CLIENT CORRESPONDENCE; FOLLOW UP ON DISCOVERY ISSUES	1.6	616.00
4/07/21	BMC	DRAFT/REVISE RULE 34 MOTION REGARDING SPECIAL INTERROGATORIES; REVIEW AND ANNOTATE EXHIBITS TO RULE 34 MOTION; DRAFT REQUESTS FOR PRODUCTION OF DOCUMENTS TO S. ZHAO, SET ONE; REVIEW COMMUNICATIONS WITH D. PETERSON REGARDING RUIFENG'S DOCUMENT PRODUCTION; DRAFT REQUESTS FOR PRODUCTION OF DOCUMENT TO QUINTARA, SET SIX; COMMUNICATIONS WITH T. NG REGARDING QUINTARA'S RESPONSES TO REQUESTS FOR ADMISSIONS; REVIEW/ANALYZE QUINTARA'S	2.2	847.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
4/07/21	DWW	RESPONSES TO REQUESTS FOR ADMISSION AND INTERROGATORIES FOR SUMMARY ADJUDICATION MOTION; REVIEW/ANALYZE QUINTARA'S PMK NOTICES TO RUIFENG AND RF BIOTECH	6.9	3,726.00
4/07/21	KP	REVIEW/ANALYSIS OF WRITTEN DISCOVERY RESPONSES; PREPARE FOR DISCOVERY CONFERENCE WITH JUDGE ALSUP; PREPARE OUTLINE FOR QUINTARA DEPOSITIONS.	6.8	4,216.00
4/07/21	TN	EMAIL CORRESPONDENCE WITH HAYSTACK AND T. NG; TELECONFERENCE WITH HAYSTACK; DOWNLOAD, EXTRACT, PROCESS GANGYOU WANG PERSONAL EMAILS (FTI CONSULTING) AND UPLOAD TO RELATIVITY; QUERY AND PROVIDE GANGYOU WANG PERSONAL EMAILS RELATIVITY REVIEW SEARCHES PER T. NG.	5.5	962.50
4/08/21	BMC	SPEAK WITH CLIENT RE [REDACTED]; CORRESPOND WITH DISCOVERY VENDOR; FURTHER REVISE DISCOVERY RESPONSES; PARTICIPATE IN REMOTE DOCUMENT COLLECTION SESSION; REVIEW AND CORRESPOND WITH PLAINTIFF; REVIEW DISCOVERY LETTERS IN PREPARATION OF HEARING	6.6	2,541.00
4/08/21	ANJ	REVIEW ORDER ASSIGNING DISCOVERY DISPUTES TO MAGISTRATE JUDGE; DRAFT OBJECTIONS TO 30B6 NOTICE TO RUIFENG; DRAFT OBJECTIONS TO 30B6 NOTICE TO RF BIOTECH; COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING TENDER OF INSURANCE AND INSURANCE CLAIMS MADE BY QUINTARA (MULTIPLE EXCHANGES); REVIEW/UPDATE DOCKET; REVIEW/ANALYZE RUIFENG'S INSURANCE POLICY FOR POTENTIAL COVERAGE OF QUINTARA'S LAWSUIT; REVIEW/ANALYZE RUIFENG'S UMBRELLA POLICY FOR POTENTIAL COVERAGE OF QUINTARA'S LAWSUIT; REVIEW QUINTARA CONTRACT FOR SERVICES REGARDING OWNERSHIP OF COMPUTERS; REVIEW/ANALYZE NORTHERN DISTRICT ORDERS REGARDING DISMISSAL OF TRADE SECRETS ON SUMMARY JUDGMENT	5.9	3,186.00
4/08/21	DWW	CONFERENCE WITH D. WISEMAN; BEGIN COMPILATION OF FINANCIAL DOCUMENTS; REDACT DISCOVERY DOCUMENTS.	2.6	390.00
4/08/21	KP	REVIEW/ANALYSIS OF AND PREPARE FOR AND PARTICIPATE IN CONFERENCE WITH JUDGE ALSUP REGARDING DISCOVERY ISSUES; REVIEW EXHIBITS FOR QUINTARA DEPOSITIONS; PREPARE FOR QUINTARA DEPOSITIONS; REVIEW DISCOVERY RESPONSES; PREPARE AND EDIT OUTLINE FOR DEPOSITIONS.	8.8	5,456.00
4/08/21	TN	EMAIL CORRESPONDENCE WITH T. NG; QUERY AND PROVIDE GANGYOU WANG PERSONAL EMAILS RELATIVITY REVIEW SEARCHES PER T. NG; IMAGE RUIFENG002 PREPRODUCTION DOCUMENTS EXPORT [REDACTED]	2.5	437.50
4/08/21	TN	[REDACTED]	4.9	1,886.50
4/08/21	TN	REVIEW CLIENT'S EMAIL PRODUCTION WITH MORE THAN 1300 DOCUMENTS FURTHER REVISE DISCOVERY RESPONSES; PREPARE FOR AND ATTEND DISCOVERY HEARING; MANAGE DOCUMENT PRODUCTION; CORRESPOND WITH CLIENT RE [REDACTED]	1.7	654.50
4/09/21	BMC	COMMUNICATIONS WITH T. NG REGARDING TENDERING INSURANCE CLAIM; COMMUNICATIONS WITH INSURANCE BROKER REGARDING POLICY; REVIEW/ANALYZE POLICY REGARDING PROPERTY DAMAGE CLAIM; MEET AND CONFER WITH D. PETERSON REGARDING QUINTARA'S DEFICIENT RESPONSES TO REQUESTS FOR ADMISSION; REVIEW RF BIOTECH'S RESPONSES TO QUINTARA'S INTERROGATORIES; REVIEW JUDGE TSE'S STANDING ORDER REGARDING DISCOVERY MOTIONS; RESEARCH [REDACTED]		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 Page 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
4/09/21	ANJ	[REDACTED] FURTHER COMPILATION OF FINANCIAL DOCUMENTS; CONFERENCE WITH T. NG; TRANSMIT DOCUMENTS TO M. SEBOLD.	5.6	3,024.00
4/09/21	DWW	PREPARATION FOR AND ATTENDANCE AT DEPOSITION PREPARATION SESSION WITH G. WANG, A. WONG, AND A. LI IN SAN FRANCISCO.	1.6	240.00
4/09/21	KP	PREPARE AND PRODUCE RUIFENG002, ENCRYPT AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE WITH T. NG.	7.1	4,402.00
4/09/21	TN	MANAGE DISCOVERY ISSUES; DISCUSS LITIGATION STRATEGY; REVIEW CORRESPONDENCE FROM PLAINTIFF RE DISCOVERY ISSUES; REVIEW COURT ORDERS	3.2	560.00
4/11/21	TN	RESOLVE DOCUMENT PRODUCTION ISSUES	1.8	693.00
4/12/21	BMC	REVIEW LETTER FROM D. PETERSON REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH K. PARKER REGARDING UPLOAD TO RELATIVITY; REVIEW COMMUNICATIONS WITH CLIENT REGARDING OWNERSHIP OF DATABASES FOR SUMMARY JUDGMENT; REVIEW/ANALYZE QUINTARA'S AMENDED RESPONSES TO SPECIAL INTERROGATORIES, SET ONE; MEET AND CONFER WITH D. PETERSON ON AMENDED RESPONSES TO SPECIAL INTERROGATORIES; VIDEO CONFERENCE MEET AND CONFER WITH D. PETERSON REGARDING QUINTARA'S REQUEST FOR ADMISSION RESPONSES; CONFERENCE WITH T. NG AND D. WISEMAN REGARDING DEPOSITIONS AND DEFENDANT'S DOCUMENT PRODUCTION	.8	308.00
4/12/21	BMC	REVIEW/ANALYZE QUINTARA'S SUPPLEMENT TRADE SECRET DOCUMENT PRODUCTION; REVIEW/ANALYZE QUINTARA'S RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	3.5	1,890.00
4/12/21	DWW	PREPARATION OF DEPOSITION OUTLINE FOR QUINTARA BIOSCIENCES.	5.3	2,862.00
4/12/21	KP	EMAIL CORRESPONDENCE AND TELECONFERENCE WITH T. NG AND B. CARR; TROUBLESHOOT QB DOCUMENT ISSUE PER A. JOHNSON; CREATE SSF ATTACHMENTS SEARCH; DOWNLOAD, EXTRACT, TROUBLESHOOT ISSUES AND UPLOAD QB004 PRODUCTION TO RELATIVITY; PREPARE CLIENT PREPRODUCTION SEARCHES PER T. NG.	5.7	3,534.00
4/12/21	TN	REVIEW CLIENT DOCUMENTS AND RESOLVE DOCUMENT PRODUCTION ISSUES; MEET AND CONFER WITH PLAINTIFF'S COUNSEL; [REDACTED] WITH CLIENT; IDENTIFY NEXT STEPS IN LITIGATION	10.1	1,767.50
4/13/21	BMC	REVIEW NOTICE OF DEPOSITION TO C. CHEN; RESEARCH REGARDING [REDACTED] COMMUNICATIONS WITH D. PETERSON REGARDING IMPROPER DEPO NOTICE	5.9	2,271.50
4/13/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING PLAINTIFF'S RESPONSES TO REQUESTS FOR ADMISSION; REVIEW/ANALYZE RESPONSES TO SPECIAL INTERROGATORIES; DRAFT RECOMMENDATION TO D. WISEMAN REGARDING MOTIONS TO COMPEL ON REQUESTS FOR ADMISSION AND SPECIAL INTERROGATORIES; REVIEW/ANALYZE PLAINTIFF'S SUPPLEMENTAL TRADE SECRET DOCUMENT PRODUCTION; REVIEW MEET AND CONFER LETTER FROM D. PETERSON REGARDING DEFENDANTS' RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET THREE; REVIEW/ANALYZE DEFENDANTS' RESPONSE TO RUIFENG'S DISCOVERY MOTION COMPELLING SPECIAL INTERROGATORY RESPONSES	.4	216.00
4/13/21	DWW	PREPARATION FOR AND TAKE DEPOSITION OF QUINTARA BIOSCIENCES.	5.8	3,132.00
			8.1	5,022.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 5
Date	Tkpr	Description of Services Rendered	Page Hours Amount
4/13/21	KP	CREATE RELATIVITY REVIEW SEARCH OF QB004 DM FOLDER DOCUMENTS PER B. CARR; PREPARE AND COPY DM HOT DOCS TO NETWORK FOR D. WISEMAN REVIEW.	1.4 245.00
4/13/21	TN	ATTEND AND PROVIDE SUPPORT TO DEPOSITION OF SUE ZHAO	3.0 1,155.00
4/13/21	TN	***NO CHARGE***: (NO CHARGE) ATTEND DEPOSITION OF SUE ZHAO	2.0
4/13/21	TN	REVIEW DISCOVERY ISSUES PRIOR TO DISCOVERY MEET AND CONFER WITH PLAINTIFF; PARTICIPATE IN VIDEO CONFERENCE TO MEET AND CONFER WITH PLAINTIFF; PREPARE WRITTEN SUMMARY OF DISCUSSION; CORRESPOND AND SPEAK WITH CLIENT	2.4 924.00
4/14/21	BMC	DRAFT OBJECTION TO CHEN SUBPOENA; COMMUNICATIONS WITH T. NG REGARDING LEASE SWAP AND T. KIMURA SUBPOENA; DRAFT SUBPOENA TO T. KIMURA; REVIEW QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION	3.8 2,052.00
4/14/21	ANJ	REVIEW AND ANALYZE CLIENT DOCUMENTS FOR NATIVE FILES OF EXHIBITS TO DECLARATION.	3.1 465.00
4/14/21	DWW	PREPARATION FOR AND TAKE DEPOSITION OF R. SHAN.	7.7 4,774.00
4/14/21	KP	EMAIL CORRESPONDENCE WITH B. CARR; PROVIDE RELATIVITY REVIEW SEARCH OF QB004 PRODUCTION SANS DM FOLDER PER B. CARR.	.6 105.00
4/14/21	TN	ATTEND AND PROVIDE SUPPORT FOR DEPOSITION; SPEAK WITH CLIENT RE [REDACTED]	3.5 1,347.50
4/14/21	TN	***NO CHARGE***: (NO CHARGE) ATTEND DEPOSITION OF RICHARD SHAN	1.5
4/15/21	RMD	ANALYZE PETITION FOR WRIT OF MANDAMUS AND DRAFT EMAIL TO MR. WISEMAN RE SAME.	.7 385.00
4/15/21	BMC	REVIEW/ANALYZE PETITION FOR WRIT OF MANDAMUS; DRAFT/REVISE SUBPOENA AND DOCUMENT DEMAND TO T. KIMURA; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH A. JOHNSON REGARDING REVIEWING SUPPLEMENTAL INVOICE DOCUMENT PRODUCTION	4.7 2,538.00
4/15/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING 4/16 DISCOVERY HEARING AND SUMMARY JUDGMENT MOTION; REVIEW COMMUNICATIONS FROM NINTH CIRCUIT REGARDING WRIT OF MANDAMUS FILED BY QUINTARA; REVIEW/ANALYZE SUBPOENAS TO BLACK MOUNTAIN, DEHUA, HU AND JIAO; MEET AND CONFER WITH D. PETERSON AND J. LI REGARDING IMPROPER SUBPOENAS IN VIOLATION OF STAY; DRAFT REQUESTS FOR ADMISSIONS TO X. ZHAO (SET ONE)	3.3 1,782.00
4/15/21	ANJ	LOCATE AND IDENTIFY ADDITIONAL NATIVE SPREADSHEETS WITH PARENT EMAIL AND ADDITIONAL ATTACHMENTS IN PREPARATION FOR PRODUCTION.	1.8 270.00
4/15/21	DWW	PREPARATION FOR DISCOVERY REFEREE HEARING.	1.1 682.00
4/15/21	KP	TROUBLESHOOT IMAGE ISSUES AND FINALIZE QB004 PRODUCTION IN RELATIVITY; PREPARE AND PRODUCE "RUIFENG002 REPROD"; EMAIL CORRESPONDENCE WITH T. NG AND B. CARR; PREPARE RFA'S PER B. CARR.	5.7 997.50
4/15/21	TN	CONSIDER STRATEGY IN RESPONDING TO REQUEST FOR PRODUCTION OF DOCUMENTS; CORRESPOND WITH CLIENT RE [REDACTED]; REVIEW CORRESPONDENCE FROM PLAINTIFF; PREPARE SUPPLEMENTAL DISCOVERY RESPONSES; REVIEW DOCUMENTS FOR UPCOMING DOCUMENT PRODUCTION	3.9 1,501.50
4/16/21	BMC	REVIEW/ANALYZE QUINTARA'S RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET FOUR; MEET AND CONFER WITH D. PETERSON REGARDING SAME; COMMUNICATIONS WITH K. PARKER	

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 6
Date	Tkpr	Description of Services Rendered	Page Hours Amount
4/16/21	ANJ	REGARDING X. ZHAO EMAILS FOR REQUESTS FOR ADMISSION; FINALIZE CHEN SUBPOENA OBJECTIONS; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW 4/16 ORDER ON DISCOVERY DISPUTES; DRAFT DISCLOSURE OF ISSUES OF EXPERT TESTIMONY FOR DEFENDANTS' CASE-IN-CHIEF PURSUANT TO CASE MANAGEMENT ORDER; REVIEW/ANALYZE CASE MANAGEMENT ORDER REGARDING EXPERT DISCLOSURES	3.5 1,890.00
4/16/21	DWW	REVIEW DOCUMENTS AND MATCH TO NATIVE VERSIONS IN PREPARATION FOR PRODUCTION; DRAFT CORRELATING CHART FOR PREVIOUSLY PRODUCED DOCUMENTS AND NATIVE VERSIONS.	1.7 255.00
4/16/21	KP	REVIEW/ANALYSIS OF WRIT TO THE NINTH CIRCUIT; TELEPHONE DEPOSITION PREPARATION CONFERENCES WITH A. WONG, R. SHAO, AND A. LI.	3.2 1,984.00
4/16/21	TN	FINALIZE "RUIFENG002 REPROD" AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE WITH T. NG AND B. CARR; PREPARE RFA'S PER B. CARR; DOWNLOAD A. LI EMAIL DATA, STAGE, PROCESS AND UPLOAD TO RELATIVITY.	4.8 840.00
4/18/21	BMC	PREPARE SUPPLEMENTAL DISCOVERY RESPONSES; MANAGE ELECTRONIC DISCOVERY ISSUES; PARTICIPATE IN CONFERENCE CALL WITH CLIENT; CORRESPOND WITH PLAINTIFF; REVIEW PLAINTIFF'S DISCOVERY RESPONSES	4.4 1,694.00
4/18/21	BMC	REVIEW PLAINTIFF'S INITIAL EXPERT DISCLOSURE; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	.3 162.00
4/18/21	TN	COMMUNICATIONS WITH D. PETERSON REGARDING REQUESTS FOR PRODUCTION OF DOCUMENTS, SET FOUR	.2 108.00
4/19/21	BMC	REVIEW AND FINALIZE RUIFENG'S 4TH DOCUMENT PRODUCTION	1.9 731.50
4/19/21	ANJ	DRAFT SUMMARY OF ALL PENDING DISCOVERY DISPUTES FOR MEET AND CONFER QUINTARA; REVIEW/ANALYZE OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET FIVE; COMMUNICATIONS WITH A. JOHNSON REGARDING QUINTARA'S DOCUMENT PRODUCTION; DRAFT DEMAND FOR INSPECTION OF VENDOR AND CUSTOMER PROFILE DATABASES; COMMUNICATION WITH D. PETERSON REGARDING DISCOVERY FROM COUNTER-CLAIMANTS; DRAFT/REVISE SUBPOENA FOR DOCUMENTS TO SUE ZHAO; COMMUNICATIONS WITH D. WISEMAN REGARDING SUBPOENA TO S. ZHAO; DRAFT REQUESTS FOR ADMISSION TO QUINTARA, SET THREE	4.9 2,646.00
4/19/21	DWW	REVIEW DOCUMENTS PRODUCED BY QUINTARA (OVER 8,800 DOCUMENTS). PREPARATION FOR DEPOSITIONS OF DEFENDANTS' WITNESSES; CORRESPONDENCE WITH R. SHAO REGARDING [REDACTED].	4.3 645.00
4/19/21	KP	PREPARE RFA'S PER B. CARR; EMAIL CORRESPONDENCE WITH B. CARR AND T. NG; QUERY AND PREPARE DOCUMENTS FOR CLIENT PRODUCTION RUIFENG004; IMAGE, EXPORT AND UPLOAD RUIFENG004 PREPRODUCTION DOCUMENTS TO SHAREFILE FOR TRANSFER TO CLIENT FOR REVIEW; DOWNLOAD AND EXTRACT QB005, TROUBLESHOOT AND UPLOAD TO RELATIVITY.	6.1 3,782.00
4/19/21	TN	PREPARE RFA'S PER B. CARR; EMAIL CORRESPONDENCE WITH B. CARR AND T. NG; QUERY AND PREPARE DOCUMENTS FOR CLIENT PRODUCTION RUIFENG004; IMAGE, EXPORT AND UPLOAD RUIFENG004 PREPRODUCTION DOCUMENTS TO SHAREFILE FOR TRANSFER TO CLIENT FOR REVIEW; DOWNLOAD AND EXTRACT QB005, TROUBLESHOOT AND UPLOAD TO RELATIVITY.	5.4 945.00
4/20/21	BMC	MANAGE DOCUMENT PRODUCTION; REVIEW CORRESPONDENCE FROM CLIENT AND PLAINTIFF; CONSIDER ISSUES RELATED TO TRADE SECRET DOCUMENT SEARCH; PARTICIPATE IN CONFERENCE CALL WITH HAYSTACK; PREPARE SUMMARY OF OUTSTANDING DISCOVERY ISSUES FOR MEET AND CONFER	2.8 1,078.00
4/20/21	BMC	COMMUNICATIONS WITH J. LI REGARDING X. ZHAO SUBPOENA; DRAFT/REVISE REQUESTS FOR ADMISSION TO QUINTARA (SET THREE); REVIEW/ANALYZE	

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		4/30/21 1072101 Page 7
Date	Tkpr	Description of Services Rendered	Hours	Amount
		QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH A. JOHNSON REGARDING DOCUMENT REVIEW PROTOCOLS AND TAGGING; COMMUNICATIONS WITH D. WISEMAN REGARDING EXPERT REPORTS; REVIEW REQUESTS FOR PRODUCTION TO RUIFENG, SET FOUR; DRAFT OBJECTIONS/RESPONSES TO REQUESTS FOR PRODUCTION SET FOUR; COMMUNICATION WITH D. WISEMAN REGARDING SUBPOENA TO LANDLORD	6.5	3,510.00
4/20/21	ANJ	REVIEW X. ZHAO DEPOSITION TESTIMONY IN PREPARATION FOR DOCUMENT REVIEW OF QUINATARA'S FIFTH PRODUCTION.	1.4	210.00
4/20/21	ANJ	FURTHER REVIEW DOCUMENTS PRODUCED BY QUINTARA (OVER 8,800 DOCUMENTS).	2.4	360.00
4/20/21	DWW	REVIEW/ANALYSIS OF RULE 30(B)(6) DEPOSITIONS AND DEPOSITIONS OF A. WONG, A. LI, AND G. WANG; REVIEW AND EDIT WRITTEN DISCOVERY.	5.7	3,534.00
4/20/21	KP	EMAIL CORRESPONDENCE WITH T. NG; PREPARE, PRODUCE, FINALIZE AND UPLOAD CLIENT PRODUCTION RUIFENG004 TO SHAREFILE FOR DELIVERY; PREPARE AND TRANSFER QB RELEVANT DOCUMENTS TO HAYSTACK PER T. NG.	4.7	822.50
4/20/21	TN	REVIEW CORRESPONDENCE FROM PLAINTIFF; MANAGE EDISCOVERY ISSUES; CORRESPOND WITH CLIENT RE [REDACTED]; CURSORY REVIEW OF QUINTARA'S 5TH DOCUMENT PRODUCTION	2.2	847.00
4/21/21	BMC	DRAFT SUBPOENA TO BLACK MOUNTAIN PROPERTIES FOR DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS; COMMUNICATIONS WITH A. SMITH REGARDING SERVICE OF SUBPOENAS; MEETING WITH A. JOHNSON REGARDING REVIEW OF QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; DRAFT OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET FOUR; REVIEW PLAINTIFF'S SUPPLEMENTAL DOCUMENT PRODUCTION; DRAFT REQUESTS FOR PRODUCTION, SET SEVEN TO QUINTARA; REVIEW/REVISE SUBPOENA TO T. KIMURA; REVIEW/REVISE NOTICE OF SUBPOENA TO T. KIMURA AND BLACK MOUNTAIN PROPERTIES; REVIEW/ANALYZE ZHAO DECLARATION REGARDING COMPUTERS AND SERVERS	6.5	3,510.00
4/21/21	ANJ	FURTHER REVIEW DOCUMENTS PRODUCED BY QUINTARA (OVER 8,800 DOCUMENTS).	3.0	450.00
4/21/21	DWW	PREPARATION FOR AND DEFEND A. WONG DEPOSITION.	7.5	4,650.00
4/21/21	TN	CORRESPOND WITH CLIENT; EVALUATE PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; MANAGE DISCOVERY ISSUES; REVIEW RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS	2.9	1,116.50
4/22/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING A. LI DEPOSITION; REVIEW QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH T. NG REGARDING PLAINTIFF'S TRADE SECRET DESIGNATION AND SEARCH FOR DOCUMENTS; DRAFT SUMMARY JUDGMENT MOTION	5.2	2,808.00
4/22/21	ANJ	FURTHER REVIEW DOCUMENTS PRODUCED BY QUINTARA (OVER 8,800 DOCUMENTS).	4.8	720.00
4/22/21	DWW	PREPARATION FOR AND DEFEND DEPOSITION OF G. WANG AS RULE 30(B)(6) WITNESS IN SAN FRANCISCO; TELEPHONE CONFERENCES WITH T. NG REGARDING SAME.	9.2	5,704.00
4/22/21	TN	[REDACTED];		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		4/30/21 1072101 8
Date	Tkpr	Description of Services Rendered	Hours	Amount
4/23/21	BMC	[REDACTED] WITH CLIENT REVIEW SUPPLEMENTAL DOCUMENT PRODUCTION LETTER FROM D. PETERSON; REVIEW/ANALYZE RESPONSES TO REQUESTS FOR PRODUCTION, SET SIX; UPDATE LIST OF DISCOVERY DISPUTES WITH ISSUES FROM RESPONSES TO REQUESTS FOR PRODUCTION, SET SIX; DRAFT/REVISE REQUESTS FOR ADMISSION,SET THREE; REVIEW QUINTARA'S SUPPLEMENT DOCUMENT PRODUCTION; COMMUNICATIONS WITH D. PETERSON REGARDING DEPOSITION OF Q. CHEN; REVIEW SERVICE REPORTS ON ZHAO; REVIEW AMENDED DEPO NOTICES TO G. WANG AND R. SHAO	1.3	500.50
4/23/21	ANJ	REVIEW AND ANALYZE DOCUMENTS IN QUINTARA'S FIFTH PRODUCTION.	4.5	2,430.00
4/23/21	ANJ	ORGANIZE AND PROVIDE DOCUMENTS FROM QUINTARA'S FOURTH PRODUCTION TO B. CARR.	.6	90.00
4/23/21	DWW	PREPARATION FOR AND DEFEND RULE 30(B)(6) DEPOSITION AND INDIVIDUAL DEPOSITION OF A. LI; REVIEW AND EDIT WRITTEN DISCOVERY TO SERVE UPON QUINTARA; REVIEW AND EDIT CORRESPONDENCE REGARDING COMPLIANCE WITH MAGISTRATE JUDGE TSE'S APRIL 16, 2021 ORDER; PREPARE, REVISE AND EDIT EMAIL CONFIRMING QUINTARA'S ABANDONMENT OF A. LI DEPOSITION.	.3	45.00
4/23/21	KP	QUERY AND TRANSFER ADDITIONAL QB DOCUMENTS FOR HAYSTACK SEARCH AGAINST CLIENT DATA; EMAIL CORRESPONDENCE WITH T. NG AND B. CARR; DOWNLOAD, EXTRACT AND UPLOAD QB006 TO RELATIVITY.	7.7	4,774.00
4/23/21	TN	[REDACTED] [REDACTED] CORRESPOND WITH CLIENT	4.6	805.00
4/26/21	BMC	REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; COMMS. WITH D. WISEMAN REGARDING OUTSTANDING DISCOVERY DISPUTES; CONFERENCE WITH D. WISEMAN AND T. NG REGARDING OUTSTANDING DISCOVERY ISSUES; COMMUNICATIONS WITH T. NG REGARDING RUIFENG'S DOCUMENT PRODUCTION; REVIEW/REVISE RUIFENG'S RESPONSES/OBJECTIONS TO REQUESTS FOR PRODUCTION, SET FOUR; COMMUNICATIONS WITH A. SMITH REGARDING T. KIMURA SUBPOENA	2.5	962.50
4/26/21	ANJ	FURTHER REVIEW OF QUINTARA'S FIFTH DOCUMENT PRODUCTION.	5.5	2,970.00
4/26/21	DWW	PREPARATION FOR AND PARTICIPATE IN [REDACTED] WITH G. WANG AND M. LIAN; TELEPHONE CONFERENCE WITH B. CARR AND T. NG REGARDING CURRENT DISCOVERY DISPUTES; PREPARE FOR HEARING WITH J. LI AND PREPARE, REVISE AND EDIT MEET AND CONFER LETTER REGARDING QUINTARA'S DEFICIENT DISCOVERY RESPONSES; PREPARE, REVISE AND EDIT LETTER REGARDING SUFFICIENCY OF DEFENDANTS RESPONSES; CONFERENCE WITH C. CHEN REGARDING DEPOSITION PREPARATION; EMAIL CORRESPONDENCE TO R. SHAO REGARDING [REDACTED]	3.1	465.00
4/26/21	TN	DISCUSS WITH CLIENT AND LITIGATION TEAM [REDACTED]; REVIEW PLAINTIFF'S CORRESPONDENCE; MANAGE EDISCOVERY ISSUES; REVIEW DISCOVERY RESPONSES; REVIEW DISCOVERY MEET AND CONFER LETTER	7.4	4,588.00
4/27/21	BMC	REVIEW QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; DRAFT/REVISE MEET AND CONFER LETTER TO J. LI REGARDING DOCUMENT PRODUCTION ISSUES	2.2	847.00
4/27/21	ANJ	FURTHER REVIEW OF QUINTARA FIFTH PRODUCTION VOLUME.	2.5	1,350.00
			1.2	180.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	4/30/21 1072101 9	
Date	Tkpr	Description of Services Rendered	Page	Amount
4/27/21	DWW	PREPARATION OF AND EDIT DISCOVERY LETTER REGARDING QUINTARA'S DEFICIENT DISCOVERY RESPONSE AND IN RESPONSE TO MEET AND CONFER REGARDING DEFENDANTS' ISSUES.	4.3	2,666.00
4/27/21	KP	DOWNLOAD AND STAGE HAYSTACK COLLECTED CLIENT EMAIL DATA; DOWNLOAD GANGYOUWANG COLLECTED COMPUTER DATA FROM HAYSTACK AND STAGE FOR PROCESSING.	3.0	525.00
4/27/21	TN	REVIEW DISCOVERY CORRESPONDENCE; MANAGE DOCUMENT COLLECTION	1.4	539.00
4/28/21	BMC	MEET AND CONFER MEETING WITH J. LI REGARDING OUTSTANDING DISCOVERY ISSUES; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW LETTER FROM D. PETERSON REGARDING DEPOSITION OBJECTIONS; REVIEW SUBPOENA TO CHARLES AND ASSOCIATES; REVIEW/ANALYZE QUINTARA'S DISCOVERY MOTION RE COMPUTER FORENSICS; REVIEW/ANALYZE QUINTARA'S DISCOVERY MOTION REGARDING DOCUMENT PRODUCTION ISSUES; REVIEW REVISED SUBPOENA TO CHEN	4.5	2,430.00
4/28/21	ANJ	FURTHER REVIEW AND ANALYSIS OF FIFTH PRODUCTION FOR ATTORNEY REVIEW.	.7	105.00
4/28/21	DWW	PREPARATION FOR ZOOM DISCOVERY CONFERENCE WITH COUNSEL FOR QUINTARA; TELEPHONE CONFERENCE WITH H. HU REGARDING IMMIGRATION RECORDS.	3.1	1,922.00
4/28/21	KP	QUERY AND PREPARE PREPRODUCTION REVIEW OF CLIENT DOCUMENTS; [REDACTED] FOR CLIENT REVIEW; EMAIL CORRESPONDENCE WITH T. NG; PROCESS AND EXPORT HAYSTACK COLLECTED CLIENT EMAIL DATA AND PREPARE FOR RELATIVITY UPLOAD..	7.0	1,225.00
4/28/21	TN	REVIEW CLIENT DOCUMENTS [REDACTED]; PARTICIPATE IN MEET AND CONFER CALL WITH PLAINTIFF'S COUNSEL; CORRESPOND WITH EDISCOVERY CONSULTANT	5.6	2,156.00
4/29/21	BMC	MEET AND CONFER WITH D. PETERSON REGARDING NOTICE OF DEPOSITION TO RUIFENG REGARDING INSPECTIONS; REVIEW NOTICE OF DEPOSITION TO RUIFENG	.3	162.00
4/29/21	BMC	DRAFT OPPOSITION TO PLAINTIFF'S MOTION FOR INSPECTION OF COMPUTERS	3.8	2,052.00
4/29/21	BMC	DRAFT OPPOSITION TO PLAINTIFF'S DISCOVERY MOTION TO COMPEL PRODUCTION OF DOCUMENTS	2.9	1,566.00
4/29/21	DWW	PREPARATION FOR AND PARTICIPATE IN ZOOM CONFERENCE WITH MAGISTRATE JUDGE AND REVIEW QUINTARA'S TEO DISCOVERY LETTERS.	4.7	2,914.00
4/29/21	KP	DOWNLOAD AND STAGE FOR PROCESSING ADDITIONAL CLIENT EMAIL COLLECTED FROM HAYSTACK; PROCESS AND FINALIZE FOR RELATIVITY REVIEW HAYSTACK COLLECTED CLIENT EMAIL DATA; EMAIL CORRESPONDENCE WITH T. NG.	4.3	752.50
4/29/21	TN	WORK ON DECLARATION OF RENE NOVOA; REVIEW PLAINTIFF'S CORRESPONDENCE; DISCUSS DOCUMENT PRODUCTION ISSUES WITH CLIENT; REVISE DISCOVERY JOINT LETTER; MANAGE DOCUMENT PRODUCTION; CORRESPOND WITH CLIENT RE DISCOVERY ISSUES	3.9	1,501.50
4/30/21	BMC	DRAFT/REVISE OBJECTION/OPPOSITION TO QUINTARA'S MOTION TO INSPECT COMPUTERS; DRAFT/REVISE OBJECTION/OPPOSITION TO QUINTARA'S MOTION FOR PRODUCTION OF ADDITIONAL DOCUMENTS; COMMUNICATIONS		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 4/30/21 1072101 10 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
4/30/21	BMC	WITH D. WISEMAN AND T. NG REGARDING OPPOSITIONS DRAFT DEFENDANTS' OMNIBUS MOTION TO COMPEL DISCOVERY FROM PLAINTIFF CONCERNING SEVEN DEFICIENT DISCOVERY RESPONSES; COMMUNICATIONS WITH A. JOHNSON REGARDING DEFENDANTS' SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH T. NG REGARDING COMPUTER FORENSIC DECLARATION	3.9	2,106.00
4/30/21	ANJ	FINALIZE REVIEW OF FIFTH PRODUCTION OF DOCUMENTS.	4.5	2,430.00
4/30/21	DWW	REVIEW/ANALYSIS OF RESPONSE TO COMPUTER FORENSIC LETTER; RESPONSE TO QUINTARA'S DISCOVERY LETTER; TELEPHONE CONFERENCE WITH FORENSIC TECHNICIANS; REVIEW REVISE AND EDIT DEFENDANTS' DISCOVERY LETTER REGARDING SEVEN TOPICS; REVIEW QUINTARA'S RESPONSES TO SPECIAL INTERROGATORIES.	.3	45.00
4/30/21	KP	REPRODUCE, EXPORT AND UPLOAD RUIFENG001 REPROD TO SHAREFILE FOR DELIVERY; PRODUCE, EXPORT, FINALIZE AND UPLOAD CLIENT PRODUCTION RUIFENG005 TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE WITH T. NG; RUN SEARCH TERMS OVER HAYSTACK COLLECTED CLIENT EMAIL DATA AND PROVIDE REPORT TO T. NG.	7.4	4,588.00
4/30/21	TN	FURTHER REVISE HAYSTACK DECLARATION; FINALIZE DOCUMENT PRODUCTION; IDENTIFY DOCUMENTARY EVIDENCE TO USE; PARTICIPATE IN CONFERENCE CALL WITH HAYSTACK	4.5	787.50
			4.4	1,694.00

Date	Description of Disbursement	CheckNo	Units	Amount
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: XUELING ZHAO, 594 ROCK ROSE WAY, RICHMOND, CA 94806 ON 3/1/21 - SAC19098	588198		237.50
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: QUN (RICHARD) SHAN, 594 ROCK ROSE WAY, RICHMOND, CA 94806 ON 3/2/21 - SAC19098A	588198		127.50
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: XUELING ZHAO, 3583 INVESTMENT BL, SUITE 2, HAYWARD, CA 94545 ON 3/10/21 - SAC19294	588198		237.50
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: QUN (RICHARD) SHAN, 3583 INVESTMENT BL, SUITE 2, HAYWARD, CA 94545 ON 3/10/21 - SAC19295	588198		127.50
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: XUELING ZHAO, 56 OXFORD ST., BELMONT, MA 02138 ON 3/11/21 - SAC19326	588198		257.50
3/31/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO CA 95814 TO: QUN (RICHARD) SHAN, 56 OXFORD ST., BELMONT, MA 02138 ON 3/11/21 - SAC19327	588198		127.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 4/30/21 1072101 11 Page

Date	Description of Disbursement	CheckNo	Units	Amount
3/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 03/11/21	587809		35.97
3/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 03/15/21	587809		14.13
3/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 03/18/21	587809		205.47
3/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 03/30/21	587809		42.38
3/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 03/31/21	587809		70.63
4/09/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 733500006 DATED: 4/09/21 TRACKING# 773358325938 ON 04/06/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: OFFICE OF THE CLERK - JUDGE AL, UNITED STATES DISTRICT COURT, 450 GOLDEN GATE AVE, 16TH FLOO, SAN FRANCISCO, CA 94102	587803		12.59
4/12/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 733614714 DATED: 4/12/21 TRACKING# 773378225591 ON 04/07/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: OFFICE OF THE CLERK - JUDGE AL, UNITED STATES DISTRICT COURT, 450 GOLDEN GATE AVE, 16TH FLOO, SAN FRANCISCO, CA 94102	587803		15.39

Recap of Services	Hours	Effective Rate	Fees
ROBERT M. DATO	.7	550.00	385.00
BRANDON M. CARR	127.1	540.00	68,634.00
ANTOINETTE N. JOHNSON	40.4	150.00	6,060.00
DYLAN WISEMAN	131.7	620.00	81,654.00
NILI YAVIN	.6	185.00	111.00
TAMERA GOODMAN	.8	185.00	148.00
KEVIN PARKER	72.1	175.00	12,617.50
TIFFANY NG	90.4	385.00	34,804.00
	3.5		No Charge
Total	467.3		204,413.50

Total Fees 204,413.50
Total Disbursements 1,511.56

Matter Total \$ 205,925.06

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

May 31, 2021
Invoice No. 1076894

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	313,293.82
Payments received through 06/07/21	100,000.00-
Previous Balance Remaining	213,293.82
Current Fees Through 05/31/21	209,693.50
Current Disbursements Through 05/31/21	13,908.86
Invoice Total	\$ 223,602.36
Balance Due	\$ 436,896.18

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
205,925.06	7,368.76	.00	436,896.18

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
3/29/21	NY	CONFER WITH T. NG RE THE FORENSIC COLLECTION, PROCESSING AND REVIEW PROTOCOL FOR THE UPCOMING PROJECT; REVIEW THE VENDOR BUDGET.	.7	129.50
3/30/21	NY	COMMUNICATIONS WITH K. PARKER RE STATUS OF FORENSICS PROJECT AND DISCOVERY EFFORTS; CONFER WITH T. NG RE DISCOVERY PROJECT AND SCOPE.	.6	111.00
3/31/21	NY	CONFER WITH T. NG AND T. GOODMAN RE RELATIVITY PROJECT.	.2	37.00
5/02/21	BMC	DRAFT/REVISE COMPUTER INSPECTION OPPOSITION; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	.9	486.00
5/02/21	TN	REVIEW COUNSEL CORRESPONDENCE RE DISCOVERY ISSUES; REVIEW CHRISTINE CHEN DOCUMENTS; [REDACTED] WITH CLIENT	1.4	539.00
5/03/21	BMC	DRAFT/REVISE COMPUTER INSPECTION OPPOSITION; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; REVIEW OBJECTIONS TO INSPECTION DEMAND; MEET AND CONFER WITH D. PETERSON REGARDING INSPECTION DEMAND; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO SPECIAL INTERROGATORIES, SET ONE; DRAFT MEET AND CONFER TO D. PETERSON REGARDING ISSUES WITH SUPPLEMENTAL RESPONSES; DRAFT/REVISE OPPOSITION TO QUINTARA'S DOCUMENT PRODUCTION MOTION; COMMUNICATIONS WITH D. PETERSON REGARDING RUIFENG 30B6 DEPOSITION; DRAFT/REVISE SEVEN DISCOVERY LETTERS TO JUDGE TSE REGARDING DEFENDANTS' DEFICIENT DISCOVERY RESPONSES; REVIEW/ANALYZE QUINTARA'S REQUESTS FOR PRODUCTION AND SPECIAL INTERROGATORIES TO RUIFENG; REVIEW/ANALYZE SUBPOENA TO STANFORD AND XU	6.8	3,672.00
5/03/21	DWW	DEPOSITION PREPARATION WITH C. CHEN; PREPARE FOR DEPOSITION OF R. SHAO; REVIEW REVISE AND EDIT DISCOVERY MOTIONS AND OPPOSITION PAPERS; CORRESPONDENCE WITH COUNSEL FOR RUIFENG REGARDING UNAUTHORIZED EDITS TO RUIFENG'S PORTION OF DISCOVERY BRIEF; CORRESPONDENCE WITH H. HU REGARDING PRODUCTION.	6.3	3,906.00
5/03/21	KP	PREPARE AND PRODUCE RUIFENG-CHRISTINE_001; PREPARE AND EXPORT RUIFENG-CHRISTINE_001 IN PDF VERSION AND COPY TO NETWORK PER T. NG; EMAIL CORRESPONDENCE WITH T. NG.	3.3	577.50
5/03/21	TN	REVIEW CLIENT CORRESPONDENCE; REVIEW PLAINTIFF'S CORRESPONDENCE RE DISCOVERY ISSUES; CONSIDER NEXT STEPS IN LITIGATION STRATEGY	1.4	539.00
5/03/21	TN	REVIEW 2800+ DOCUMENTS FOR RUI SHAO'S PRODUCTION	4.2	1,617.00
5/04/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING XU AND STANFORD SUBPOENAS AND EXPERT REPORTS; REVIEW UPDATED DISCOVERY MOTIONS REGARDING QUINTARA'S DEFICIENT RESPONSES COMMUNICATIONS WITH D. PETERSON REGARDING MEET AND CONFER ON AMENDED SPECIAL INTERROGATORY RESPONSES; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW DOCKET REGARDING TRIAL DEADLINES;	3.5	1,890.00
5/04/21	DWW	PREPARATION FOR TELEPHONE CONFERENCE WITH J. JIAO; TELEPHONE CONFERENCE WITH C. CHEN AND INTERPRETER REGARDING DEPOSITION TESTIMONY; CONFERENCE CALL WITH HAYSTACKID TEAM REGARDING ADDITIONAL FORENSIC WORK; REVIEW, REVISE AND EDIT DISCOVERY		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/04/21	KP	LETTERS TO JUDGE TSE REGARDING REQUESTS FOR ADMISSION, SPECIAL INTERROGATORIES, AND THIRD PARTY WITNESS SUBPOENAS; REVIEW QUINTARA'S SUPPLEMENTAL RESPONSE TO WANG'S INTERROGATORIES; REVIEW QUINTARA'S SUPPLEMENTAL RESPONSES TO INSPECTION DEMANDS AND SPECIAL INTERROGATORIES.	6.8	4,216.00
5/04/21	TN	EXPORT AND FINALIZE CLIENT PRODUCTION RUIFENG-CHRISTINE_001, ENCRYPT AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE WITH T. NG.; EMAIL CORRESPONDENCE WITH T. NG; PREPARE RUIFENG-RUI_001 PDF VERSION AND COPY TO NETWORK PER T. NG; REPRODUCE RUIFENG-CHRISTINE_001 PER T. NG; CAPTURE BIOPHARMGUY.COM WEBSITE AND PREPARE FOR PRODUCTION.	6.6	1,155.00
5/05/21	BMC	REVIEW PLAINTIFF'S CORRESPONDENCE; CORRESPOND WITH CLIENT RE [REDACTED]; MANAGE CHRISTINE CHEN AND RUI SHAO'S DOCUMENT PRODUCTION; PARTICIPATE IN CHRISTINE CHEN DEPOSITION PREPARATION CALL	2.8	1,078.00
5/05/21	DWW	DRAFT RESPONSES/OBJECTIONS TO SPECIAL INTERROGATORIES, SET TWO; REVIEW/ANALYZE OBJECTIONS TO ZHAO AND KIMURA SUBPOENAS; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL TRADE SECRET DOCUMENT PRODUCTION; COMMUNICATIONS WITH A. SMITH REGARDING NOTICE TO PARTIES QUINTARA SUBPOENAED TO NOT PRODUCE DOCUMENTS UNTIL DISCOVERY MOTIONS RESOLVED	3.5	1,890.00
5/05/21	KP	PREPARATION FOR AND DEFEND CHRISTINE CHEN DEPOSITION; REVIEW AND RESPOND TO CORRESPONDENCE REGARDING WRITTEN DISCOVERY AND FINALIZE FOR FILING.	8.1	5,022.00
5/05/21	TN	EMAIL CORRESPONDENCE WITH D. WISEMAN AND IT SUPPORT; CREATE NEW CLIENT CASE IN CASENOTEBOOK; LOG IN AND ATTEMPT TO INSTALL CASENOTEBOOK ON D. WISEMAN COMPUTER; REPRODUCE RUIFENG-CHRISTINE_001 FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; CAPTURE BIOPHARMGUY.COM WEBSITE AND PREPARE FOR PRODUCTION.	4.6	805.00
5/06/21	DWW	REVIEW CLIENT CORRESPONDENCE; REVIEW WANG DOCUMENTS; RESPOND TO DISCOVERY ISSUES; SPEAK WITH CHRISTINE CHEN	1.9	731.50
5/06/21	KP	AND DEFEND RUI SHAO DEPOSITION: TELEPHONE CONFERENCES WITH T. NG REGARDING STATUS; PREPARE FOR WANG DEPOSITION IN SAN FRANCISCO.	9.2	5,704.00
5/06/21	TN	EMAIL CORRESPONDENCE WITH T. NG; [REDACTED]; CORRESPOND WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION; COMPILE SEARCH TERMS; REVIEW JUDGE'S ORDER; SPEAK WITH CLIENT	3.8	665.00
5/07/21	BMC	REVIEW ORDER COMPELLING INSPECTION OF COMPUTERS	2.6	1,001.00
5/07/21	BMC	REVIEW LETTER FROM D. PETERSON REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH K. PARKER REGARDING UPLOADING PRODUCTION TO RELATIVITY; MEET AND CONFER WITH D. PETERSON REGARDING QUINTARA'S AMENDED SPECIAL INTERROGATORY RESPONSES	.2	108.00
5/07/21	ANJ	REVIEW AND ANALYZE DOCUMENTS FOR PRODUCTION.	1.5	810.00
5/07/21	DWW	PREPARATION FOR AND DEFEND DEPOSITION OF G. WANG; TELEPHONE CONFERENCE WITH T. NG REGARDING \$1M DEMAND UPON QUINTARA; REVIEW AND RESPOND TO EMAILS FROM COUNSEL FOR QUINTARA	3.4	510.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 3	
Date	Tkpr	Description of Services Rendered	Page	Amount
5/07/21	KP	REGARDING DISCOVERY ISSUES.	8.2	5,084.00
5/07/21	TN	EMAIL CORRESPONDENCE WITH T. NG; PREPARE CLIENT PRODUCTION RUIFENG006, PRODUCE, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; QUERY CLIENT EMAIL DATA AND PREPARE REVIEW BATCHES PER T. NG.	4.0	700.00
5/09/21	TN	IDENTIFY PERTINENT DOCUMENTS FOR TOMO'S DEPOSITION; REVIEW VARIOUS COUNSEL AND WITNESS CORRESPONDENCE; CONSIDER NEXT STEPS IN LITIGATION STRATEGY	2.9	1,116.50
5/10/21	BMC	REVIEW CLIENT CORRESPONDENCE RE [REDACTED]; WRITE MOTION FOR RELIEF	4.8	1,848.00
5/10/21	ANJ	REVIEW/ANALYZE DOCUMENTS PRODUCED BY HAILONG JIAO; MEET AND CONFER WITH D. PETERSON REGARDING QUINTARA'S AMENDED RESPONSES TO SPECIAL INTERROGATORIES (SET 1); DRAFT RESPONSE TO REQUESTS FOR PRODUCTION, SET FIVE; DRAFT RESPONSES TO 2ND SET INTERROGATORIES TO RF BIOTECH; DRAFT RESPONSES TO 2ND SET OF INTERROGATORIES TO RUIFENG; RESEARCH REGARDING [REDACTED]; REVIEW DISCOVERY ORDER FROM JUDGE TSE	2.9	1,566.00
5/10/21	DWW	FURTHER REVIEW OF DOCUMENTS IN PREPARATION FOR PRODUCTION. PREPARATION FOR AND DEFEND DEPOSITION OF HAILONG JIAO; REVIEW AND RESPOND TO CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING DEPOSITION CONDUCT; PREPARE, REVISE AND EDIT LETTER TO DEMAND REPAYMENT OF \$1M FROM QUINTARA; REVIEW, REVISE AND EDIT DEFENDANTS' PORTION OF THREE DISCOVERY LETTERS TO JUDGE TSE; CORRESPONDENCE WITH H. HU REGARDING DOCUMENT PRODUCTION; CORRESPONDENCE TO COUNSEL FOR RUIFENG REGARDING SUE ZHAO COMPLIANCE WITH SUBPEONA.	2.6	390.00
5/10/21	KP	EMAIL CORRESPONDENCE WITH T. NG; QUERY "TOMO" TAGGED RELATIVITY DOCUMENTS, IMAGE, EXPORT AND COPY TO NETWORK PER T. NG; PROCESS CLIENT DATA AND UPLOAD TO RELATIVITY FOR PRODUCTION; PREPARE, PRODUCE, FINALIZE CLIENT PRODUCTION RUIFENG007 AND UPLOAD TO SHAREFILE FOR DELIVERY.	5.9	3,658.00
5/10/21	TN	REVIEW COUNSEL CORRESPONDENCE; CORRESPOND WITH CLIENT; MANAGE DOCUMENT PRODUCTION ISSUES; REVIEW COURT ORDERS	2.7	472.50
5/10/21	TN	REVIEW AROUND 700 CLIENT DOCUMENTS RELATED TO CUSTOMERS AND VENDORS FOR RESPONSIVENESS	1.9	731.50
5/11/21	BMC	REVIEW/ANALYZE RUIFENG'S RESPONSES TO REQUESTS FOR PRODUCTION, SET SEVEN; REVIEW/ANALYZE RUIFENG'S RESPONSES TO REQUESTS FOR ADMISSION, SET THREE; COMMUNICATIONS WITH D. PETERSON AND K. PARKER REGARDING 5/10 DOCUMENT PRODUCTION; COMMUNICATIONS WITH D. PETERSON REGARDING BLACK MOUNTAIN DOCUMENT PRODUCTION	2.0	770.00
5/11/21	ANJ	FURTHER REVIEW OF VOLUMINOUS DOCUMENTS IN PREPARATION FOR PRODUCTION.	.9	486.00
5/11/21	DWW	REVIEW/REVISION OF DRAFT EXPERT WITNESS DISCLOSURE; CORRESPONDENCE WITH MR. WANG REGARDING [REDACTED]; [REDACTED] ZOOM CALL WITH HAYSTACK REGARDING FORENSIC REPORT; REVIEW AND EDIT MOTION FOR RELIEF FROM NON-DISPOSITIVE PRETRIAL ORDER BY MAGISTRATE JUDGE.	3.1	465.00
5/11/21	DWW	PREPARATION FOR T. KIMURA DEPOSITOIN; PREPARATION FOR BLACK	2.7	1,674.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 Page 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/11/21	KP	MOUNTAIN DEPOSITION; TELEPHONE CONFERENCE WITH T. NG REGARDING EVIDENCE FOR BLACK MOUNTAIN DEPOSITONS.	5.2	3,224.00
5/11/21	TN	DOWNLOAD, EXTRACT, TROUBLESHOOT AND FIX IMAGE ISSUES AND UPLOAD QB007 AND QB008 OPPOSING PRODUCTIONS TO RELATIVITY; EMAIL CORRESPONDENCE WITH B. CARR.	3.3	577.50
5/12/21	BMC	PREPARE MOTION FOR RELIEF AND SUPPORTING DOCUMENTS; CORRESPOND AND SPEAK WITH CLIENT RE LITIGATION STATUS; REVIEW PLAINTIFF'S CORRESPONDENCE; MANAGE DOCUMENT REVIEW; REVIEW BLACK MOUNTAIN DOCUMENT PRODUCTION; REVIEW CLIENT [REDACTED]	4.8	1,848.00
5/12/21	ANJ	DRAFT/REVISE OBJECTIONS TO INTERROGATORIES TO RF BIOTECH, SET ONE; DRAFT/REVISE OBJECTIONS TO INTERROGATORIES TO RUIFENG, SET TWO; DRAFT/REVISE REQUESTS FOR PRODUCTION SET FIVE TO RUIFENG; COMMUNICATIONS WITH T. NG REGARDING RUIFENG'S FINANCIAL DOCUMENTS REQUESTED BY QUINTARA; REVIEW/ANALYZE QUINTARA'S FIFTH SUPPLEMENTAL DOCUMENT PRODUCTION; COMMUNICATIONS WITH D. WISEMAN REGARDING EXPERT DISCOVERY REPORTS	3.6	1,944.00
5/12/21	DWW	FURTHER REVIEW OF VOLUMINOUS DOCUMENTS IN PREPARATION FOR PRODUCTION.	3.4	510.00
5/12/21	KP	PREPARATION OF AND ATTEND/TAKE DEPOSITION OF BLACK MOUNTAIN; PREPARE MEET AND CONFER LETTER REGARDING ZHAO SUBPOENA; CORRESPONDENCE WITH H. HU REGARDING DOCUMENT PRODUCTION; REVIEW H. HU PRODUCTION; PREP SESSION WITH D. ZHAO.	5.8	3,596.00
5/12/21	TN	DOWNLOAD, STAGE AND UPLOAD BLACK MOUNTAIN DOCUMENT PRODUCTION TO RELATIVITY FOR REVIEW; EMAIL CORRESPONDENCE AND TELECONFERENCE WITH T. NG; MASS-TAG CLIENT DOCUMENTS AND RE-BATCH FOR RELATIVITY REVIEW PER T. NG; STAGE AND PROCESS CLIENT GOOGLE DRIVE DATA.	3.7	647.50
5/13/21	BMC	REVIEW CUSTOMER AND VENDOR DOCUMENTS; FINALIZE DISCOVERY RESPONSES; CORRESPOND WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; MANAGE ISSUES RELATED TO GOOGLE DOCS COLLECTION	6.8	2,618.00
5/13/21	ANJ	RESEARCH REGARDING [REDACTED] COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; COMMUNICATIONS WITH D. PETERSON REGARDING QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION	.9	486.00
5/13/21	DWW	FURTHER REVIEW OF VOLUMINOUS DOCUMENTS IN PREPARATION FOR PRODUCTION.	5.0	750.00
5/13/21	KP	PREPARATION FOR AND DEFEND DEPOSITION OF D. ZHAO; REVIEW, REVISE AND EDIT DISCOVERY RESPONSES TO QUINTARA; REVIEW AND PREPARE DEFENDANTS' MOTIONS TO COMPEL; RESEARCH REGARDING [REDACTED] PREPARE FOR W. XU DEPOSITION; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING ZHAO MEET AND CONNFER.	5.9	3,658.00
5/13/21	KP	STAGE AND PROCESS "RUIFENG WANG IMMIGRATION" DATA AND PREPARE AND PRODUCE AS RUIFENG-HU_001 PRODUCTION, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.; EMAIL CORRESPONDENCE AND TELECONFERENCE WITH T. NG; QUERY AND PREPARE 2ND LEVEL RELATIVITY		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 5	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/13/21	TN	REVIEW BATCHES AND PROVIDE REPORTING; QUERY AND PREPARE GANGYOU WANG PRE PRODUCTION RELATIVITY REVIEW SEARCH; IMAGE G. WANG PRE PRODUCTION DOCUMENTS, [REDACTED] CLIENT FOR REVIEW.	5.8	1,015.00
5/14/21	RMD	REVIEW CUSTOMER AND VENDOR DOCUMENTS FOR PRODUCTION; REVIEW CLIENT'S IMMIGRATION FILE; REVIEW CORRESPONDENCE FROM PLAINTIFF AND CLIENT; SPEAK WITH CLIENT RE [REDACTED]	12.5	4,812.50
5/14/21	BMC	CONFERENCE CALL WITH MR. WISEMAN ET AL. RE NINTH CIRCUIT ORDER REQUESTING ANSWER TO PETITION FOR WRIT OF MANDAMUS AND BEGIN ANALYSIS OF RECORD TO DEVELOP STRATEGY FOR ANSWER.	5.8	3,190.00
5/14/21	ANJ	REVIEW NINTH CIRCUIT ORDER REGARDING PLAINTIFF'S WRIT OF MANDUMUS; COMMUNICATIONS WITH R. DATO REGARDING RESPONSE TO COURT OF APPEAL; REVIEW/ANALYZE CASE LAW AUTHORIZING MOTION TO STRIKE TRADE SECRETS FOR R. DATO; COMMUNICATIONS WITH D. PETERSON REGARDING HU DOCUMENT PRODUCTION; REVIEW/ANALYZE QUINTARA'S DISCLOSURE OF NON-RETAINED EXPERT; REVIEW/ANALYZE THREE DISCOVERY ORDERS FROM JUDGE TSE	3.3	1,782.00
5/14/21	DWW	FURTHER REVIEW OF VOLUMINOUS DOCUMENTS AND FOR PRODUCTION; REVIEW AND COMPARE ADDITIONAL CLIENT DOCUMENTS AND ASSIST WITH FINALIZING PRODUCTION.	5.0	750.00
5/14/21	KP	ATTENDANCE AT DEFEND W. XU DEPO; TELEPHONE CONFERENCE WITH COMPUTER FORENSIC CONSULTANT; PREPARE FOR AND PARTICIPATE IN MEET AND CONFER SESSION WITH COUNSEL FOR QUINTARA REGARDING RESPONSE TO ZHAO DEPOSITION AND FAILURE TO PRESERVE EVIDENCE AND ALLOWING QUINTARA TO SCULPT FACTS BASED ON NON-COMPLIANCE WITH RULE 34; EMAIL CORRESPONDENCE WITH A. LI, C. CHEN AND A. WONG REGARDING [REDACTED]; REVIEW AND EDIT FORENSIC REPORT WITH R. NOVOA; TELEPHONE CONFERENCE WITH QUINTARA'S COUNSEL REGARDING FAILURE TO PRESERVE EVIDENCE.	4.7	2,914.00
5/14/21	TN	STAGE CLIENT DOCUMENTS, PROCESS AND UPLOAD TO RELATIVITY FOR REVIEW AND PRODUCTION; PREPARE AND PRODUCE RUIFENG008 AND RUIFENG009, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE AND TELECONFERENCE WITH T. NG.	11.0	1,925.00
5/14/21	JR	CONTINUE TO REVIEW AND MANAGE DOCUMENT PRODUCTION; REVIEW COURT ORDERS; CORRESPOND AND SPEAK WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; PARTICIPATE IN CONFERENCE CALL TO DISCUSS WRIT	6.8	2,618.00
5/15/21	DWW	RESEARCH [REDACTED]	.4	260.00
5/16/21	TN	REVIEW/ANALYSIS OF REVIEW QUINTARA'S EXPERT DISCLOSURE; RESEARCH [REDACTED]	2.4	1,488.00
5/17/21	RMD	DISCUSS ISSUES RELATED TO BLACK MOUNTAIN DEPOSITION AND REVIEW RELATED CORRESPONDENCE; PREPARE FOR DEPOSITION; REVIEW VARIOUS EMAILS FROM PLAINTIFF RE DISCOVERY ISSUES	3.7	1,424.50
5/17/21	BMC	FURTHER ANALYZE RECORD IN MANDAMUS PROCEEDING AND BEGIN DRAFT ANSWER TO SAME.	7.7	4,235.00
		DRAFT DEPOSITION SUBPOENA TO NON-RETAINED EXPERT WITNESS T. KIMURA; REVIEW/ANALYZE BERRY HILL EXPERT REPORT; RESEARCH		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 5/31/21 1076894 6 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
		REGARDING [REDACTED]		
		[REDACTED]	2.7	1,458.00
5/17/21	ANJ	RESEARCH [REDACTED]	.6	90.00
5/17/21	DWW	REVIEW/ANALYSIS OF WRIT TO THE NINTH CIRCUIT FROM QUINTARA REGARDING DISMISSAL OF TRADE SECRETS; TELEPHONE CONFERENCE WITH EMAIL WITH T. NG REARDING BLACK MOUNTAIN TESTIMONY,	3.3	2,046.00
5/17/21	KP	EMAIL CORRESPONDENCE AND TELECONFERENCE WITH WITH A. SMITH AND FIRSTLEGAL. DOWNLOAD AND EXTRACT APTUS DEPOSITIONS; SYNCHRONIZE ALEX WONG TRANSCRIPTS AND EXHIBITS AND UPLOAD TO CASENOTEBOOK.	2.6	455.00
5/17/21	TN	PREPARE FOR BLACK MOUNTAIN'S DEPOSITION; TAKE BLACK MOUNTAIN'S DEPOSITION; [REDACTED] WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION; WORK ON WRIT	4.4	1,694.00
5/18/21	RMD	FURTHER ANALYZE RECORD AND FURTHER DRAFT ANSWER TO PETITION FOR WRIT OF MANDAMUS, INCLUDING ATTENDANT LEGAL RESEARCH.	7.5	4,125.00
5/18/21	BMC	DRAFT/REVISE DEPOSITION SUBPOENA TO NON-RETAINED EXPERT WITNESS T. KIMURA; DRAFT SUBPOENA, NOTICE OF SUBPOENA AND REQUEST FOR PRODUCTION OF DOCUMENTS TO QUINTARA'S EXPERT WITNESS BERRYHILL; REVIEW/ANALYZE BERRYHILL EXPERT REPORT; REVIEW MEET AND CONFER LETTERS FROM D. PETERSON; COMMUNICATIONS WITH D. PETERSON REGARDING UNTIMELY MEET AND CONFER; REVIEW STATUS OF REVIEW OF QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTIONS; REVIEW DISCOVERY MOTIONS FROM QUINTARA REGARDING DEPOSITION CONDUCT AND WECHAT DOCUMENT SEARCH; REVIEW UPCOMING PRE-TRIAL DEADLINES; COMMUNICATIONS WITH D. PETERSON REGARDING INSPECTION OF ORIGINAL DOCUMENTS; CONFER WITH D. PETERSON REGARDING NARROWING SUBPOENAS PER DISCOVERY ORDER; CONFER WITH T. NG REGARDING DOCUMENTS QUINTARA HAS NOT PRODUCED AND MOTION TO COMPEL	5.5	2,970.00
5/18/21	ANJ	DOWNLOAD ADDITIONAL IMMIGRATION DOCUMENTS; REVIEW AND ANALYZE OPPOSING COUNSEL EMAIL AND IMMIGRATION FILES; IDENTIFY DOCUMENTS REQUESTED THAT HAVE BEEN PRODUCED.	2.2	330.00
5/18/21	DWW	PREPARATION OF DEFENDANTS' RESPONSE TO QUINTARTA'S MOTION FOR DEPOSITION SANCTIONS AND IN RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS; CORRESPONDENCE WITH B. CARR REGARDING DEFENDANTS' DOCUMENT PRODUCTION AND RESPONSE TO REQUESTS FOR PRODUCITON NOS. 4-5.	7.4	4,588.00
5/18/21	KP	DOWNLOAD AND STAGE QB009, TROUBLESHOOT AND FIX IMAGES ISSUES AND UPLOAD TO RELATIVITY FOR REVIEW.	1.0	175.00
5/18/21	TN	WRITE DISCOVERY LETTER RE WECHAT PRODUCTION; REVIEW CORRESPONDENCE FROM PLAINTIFF'S COUNSEL; [REDACTED]		
5/19/21	RMD	CLIENT; CORRESPOND WITH HENRY HU; [REDACTED] ALEX WONG FURTHER DRAFT ANSWER TO PETITION FOR WRIT OF MANDAMUS AND FURTHER RESEARCH RE [REDACTED]	5.9	2,271.50
5/19/21	BMC	[REDACTED] COMMUNICATIONS WITH D. PETERSON REGARDING NARROWING SCOPE OF CHARLES & ASSOCIATES SUBPOENA; REVIEW/ANALYZE RESPONSES TO REQUESTS FOR PRODUCTION FOUR; DRAFT MEMO TO D. WISEMAN	8.1	4,455.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 7	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/19/21	BMC	REGARDING RECOMMENDED AMENDMENTS; REVIEW/ANALYZE MEET AND CONFER LETTER FROM D. PETERSON REGARDING REQUESTS FOR PRODUCTION FOUR AND FIVE; MEET AND CONFER WITH D. PETERSON REGARDING ISSUES RAISED IN LETTER; CONFERENCE WITH T. NG REGARDING OUTSTANDING DISCOVERY ISSUES AND MOTIONS BEFORE DISCOVERY CUTOFF; COMMUNICATIONS WITH D. PETERSON REGARDING CONTINUING DISCOVERY DEADLINE TO MAY 28; REVIEW COMMUNICATIONS FORM J. LI REGARDING DISCOVERY MOTION ISSUES (MULTIPLE EXCHANGES)	5.4	2,916.00
5/19/21	ANJ	REVIEW/APPROVE ZHAO MOTION FOR FILING; DRAFT ADMIN MOTION CONTINUING MOTION TO COMPEL DEADLINE; DRAFT/REVISE/FINALIZE OPPOSITION TO DEPOSITION CONDUCT MOTION; REVIEW/REVISE OPPOSITION TO WECHAT MOTION	3.5	1,890.00
5/19/21	DWW	REVIEW AND ANALYZE PRODUCTIONS AND PROVIDE OVERVIEW OF DOCUMENTS PRODUCED.	1.4	210.00
5/19/21	KP	PREPARATION OF DEFENDANTS' OPPOSITION TO QUINTARA'S JOINT MOTION REGARDING DEPOSITIONS AND INSPECTION DEMANDS.	6.7	4,154.00
5/19/21	TN	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND UPLOAD HENRY HU DATA TO RELATIVITY; PREPARE AND PRODUCE RUIFENG-HU_003, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.	3.0	525.00
5/19/21	DG	WORK ON VARIOUS TASKS INCLUDING REVIEW OF IMMIGRATION FILE, PREPARE DISCOVERY JOINT LETTERS, RESPOND TO COUNSEL [REDACTED] WITH CLIENT	5.4	2,079.00
5/20/21	RMD	PREPARE ADMINISTRATIVE MOTION AND PROPOSED ORDER TO EXTEND DEADLINE TO FILE MOTION TO COMPEL.	1.5	517.50
5/20/21	BMC	FURTHER DRAFT ANSWER TO PETITION FOR WRIT OF MANDAMUS, INCLUDING [REDACTED] RESEARCH.	7.4	4,070.00
5/20/21	BMC	DRAFT MEET AND CONFER TO D. PETERSON REGARDING AMENDING REQUESTS FOR PRODUCTION SET FOUR AND FIVE; DRAFT AMENDED RESPONSES TO REQUEST FOR PRODUCTION, SET FOUR; COMMUNICATIONS WITH T. NG REGARDING GATHERING ADDITIONAL RESPONSIVE DOCUMENTS TO PRODUCE; DRAFT/REVISE ADMIN MOTION TO EXTEND MOTION TO COMPEL DEADLINE; DRAFT/REVISE PROPOSED ORDER EXTENDING MOTION TO COMPEL DEADLINE; REVIEW LOCAL RULES REGARDING ADMINISTRATIVE MOTION; COMMUNICATIONS WITH D. PETERSON REGARDING INSPECTION OF DOCUMENTS; COMMUNICATIONS WITH D. PETERSON REGARDING MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION SET FOUR AND FIVE AND NARROWING SUBPOENAS	5.8	3,132.00
5/20/21	ANJ	DRAFT OPPOSITION TO PLAINTIFF'S MOTION FOR FURTHER RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS SET FOUR AND FIVE AND SUBPOENA DURATION ISSUE FOR RUIFENG'S FINANCIAL DOCUMENTS; CONFER WITH D. WISEMAN REGARDING OPPOSITION; REVIEW ORDER REGARDING TIME FRAME FOR QUINTARA'S FINANCIAL DOCUMENTS; REVIEW MEET AND CONFER CORRESPONDENCE ON REQUESTS FOR PRODUCTION SET FOUR AND FIVE	2.6	1,404.00
5/20/21	DWW	PERFORM SEARCHES FOR T. NG REVIEW FOR FINANCIAL TAGS AND HELD BACK QUINTARA DOCUMENTS REGARDING SCIENCE; REVIEW QUINTARA DOCUMENT PRODUCTION VOLUME 7.	3.0	450.00
5/20/21	DWW	REVIEW/REVISION OF SUBPOENA TO T. KIMURA; PREPARE FOR AND		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 Page 8	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/20/21	KP	PARTICIPATE IN ZOOM CONFERENCE WITH COUNSEL FOR QUINTARA REGARDING FAILURE TO PRESERVE AND REVIEW EVIDENCE; PREPARE, REVISE AND EDIT BRIEF REGARDING SAME.	6.4	3,968.00
5/20/21	TN	EMAIL CORRESPONDENCE WITH T. NG AND A. JOHNSON; QUERY CLIENT DATA AND PROVIDE RELATIVITY REVIEW SEARCHES PER T. NG.	1.8	315.00
5/20/21	BE	REVIEW DOCUMENTS; REVIEW CORRESPONDENCE FROM COUNSEL; WORK ON VARIOUS DISCOVERY ISSUES; [REDACTED] WITH CLIENT; REVISE DISCOVERY RESPONSES	4.0	1,540.00
5/20/21	BE	RESEARCH AND DRAFT [REDACTED]	4.8	1,800.00
5/21/21	RMD	FURTHER DRAFT AND COMPLETE INITIAL DRAFT OF ANSWER TO PETITION FOR WRIT OF MANDAMUS AND TRANSMIT SAME TO MR. WISEMAN ET AL.	8.3	4,565.00
5/21/21	BMC	REVISE/FINALIZE ZHAO DISCOVERY MOTION; REVIEW/ANALYZE QUINTARA'S MOTION REGARDING REQUESTS FOR PRODUCTION SET FOUR AND FIVE AND SUBPOENAS; DRAFT/REVISE OPPOSITION TO MOTION REGARDING REQUESTS FOR PRODUCTION SET FOUR AND FIVE AND SUBPOENAS; COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING OPPOSITION TO MOTION REGARDING REQUESTS FOR PRODUCTION SET FOUR AND FIVE AND SUBPOENAS; COMMUNICATIONS WITH D. WISEMAN REGARDING T. KIMURA SUBPOENA AND REQUEST TO INSPECT ORIGINAL DOCUMENTS	5.7	3,078.00
5/21/21	ANJ	REVIEW MEET AND CONFER EMAIL REGARDING FINANCIAL RECORDS AND INSERT BATES NUMBERS; FURTHER REVIEW OF QUINTARA DOCUMENT PRODUCTIONS.	2.1	315.00
5/21/21	DWW	REVIEW/REVISION OF DEFENDANTS' PORTION OF JOINT STATEMENT REGARDING MOTION TO COMPEL AND FOR SANCTIONS; TELEPHONE CONFERENCE WITH T. NG REGARDING DISCOVERY UPDATE; REVIEW AND EDIT DEFENDANTS' RESPONSE TO MOTION TO COMPEL FOR QUINTARA'S REQUESTS FOR PRODUCTION OF DOCUMENTS NOS. 4-5; TELEPHONE CONFERENCE WITH G. WANG REGARDING QUINTARA'S FAILURE TO PRESERVE EVIDENCE; REVIEW AND ANALYZE DRAFT ANSWER TO APPEAL TO NINTH CIRCUIT.	6.2	3,844.00
5/21/21	KP	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND UPLOAD HENRY HU DATA TO RELATIVITY; PREPARE AND PRODUCE RUIFENG-HU_003, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.	2.4	420.00
5/21/21	TN	[REDACTED] WITH CLIENT; REVIEW AND REVISE DISCOVERY JOINT LETTERS; REVIEW PLAINTIFF'S CORRESPONDENCE; MANAGE IMMIGRATION FILE ISSUES; REVIEW DRAFT APPEAL BRIEF	3.9	1,501.50
5/22/21	TN	REVIEW CLIENT CORRESPONDENCE RE LITIGATION STRATEGY AND ERRATA SHEET; CONSIDER NEXT STEPS IN LITIGATION	.2	77.00
5/23/21	RMD	REVISE ANSWER TO PETITION FOR WRIT OF MANDAMUS.	.2	110.00
5/23/21	TN	REVIEW DOCUMENTS FOR SUPPLEMENTAL PRODUCTION	1.3	500.50
5/24/21	BMC	REVIEW/ANALYZE ANSWER TO WRIT OF MANDAMUS; COMMUNICATIONS WITH B. DATO REGARDING REVISIONS TO ANSWER; REVIEW CASES REGARDING USING MOTION TO STRIKE TO DISMISS TRADE SECRET CLAIMS; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION, SET SIX; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO REQUESTS FOR PRODUCTION, SET FOUR; REVIEW/ANALYZE OBJECTIONS TO T. KIMURA SUBPOENA; REVIEW DOCUMENTS PRODUCTION		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 9	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/24/21	ANJ	LETTER FROM D. PETERSON; COMMUNICATIONS WITH D. WISEMAN REGARDING EXPERT REPORTS; REVIEW CASE MANAGEMENT ORDER REGARDING EXPERT AND DAMAGE DEADLINES	3.7	1,998.00
5/24/21	DWW	REVIEW AND PROVIDE ADDITIONAL FINANCIAL DOCUMENTS TO T. NG FOR FURTHER REVIEW.	.8	120.00
5/24/21	TN	REVIEW/ANALYSIS OF ANSWER TO WRIT OF MANDAMUS; REVIEW A. WONG DEPO ERRATA SHEET; PREPARE OUTLIN FOR MOTION FOR TERMINATING SANCTIONS; RESEARCH REGARDING [REDACTED]	2.6	1,612.00
5/24/21	BE	REVIEW FINANCIAL DOCUMENTS; EVALUATE QUINTARA'S EXPERT DISCLOSURE; PARTICIPATE IN CONFERENCE CALL REGARDING FINANCIAL EXPERT REPORT; EVALUATE AND RESPOND TO ISSUES RELATED TO IMMIGRATION FILE; FURTHER CONSIDER APPEAL STRATEGY	3.6	1,386.00
5/25/21	BMC	DISCUSS MOTION FOR ISSUE, EVIDENTIARY OR TERMINATING SANCTIONS. REVIEW REVISED ANSWER TO WRIT OF MANDAMUS; COMMUNICATIONS WITH A. SMITH REGARDING AMENDED RESPONSES TO REQUESTS FOR PRODUCTION, SET FOUR; COMMUNICATIONS WITH D. WISEMAN REGARDING WAIVER OF PRIVILEGE FOR T. KIMURA ONCE DESIGNATED AS EXPERT WITNESS; REVIEW CASE LAW ON WAIVER OF PRIVILEGE WHEN DESIGNATING OFFICER AS EXPERT WITNESS	.2	75.00
5/25/21	DWW	TELEPHONE CONFERENCE WITH M. SEBOLD REGARDING RULE 26 REPORT; PREPARE, REVISE AND EDIT MOTION TO T. KIMURA AS NON-RETAINED EXPERT.	1.1	594.00
5/25/21	TN	MANAGE DOCUMENT PRODUCTION; PARTICIPATE IN CONFERENCE CALL WITH DAMAGES EXPERT; REVIEW DISCOVERY CORRESPONDENCE; CONSIDER EXPERT ISSUE	2.5	1,550.00
5/25/21	EE	ASSIST WITH RELATIVITY SAVED SEARCHES AND PRODUCTION DELIVERY.	2.4	924.00
5/25/21	BE	OUTLINE/DRAFT MOTION FOR SANCTIONS. REVIEW JOINT LETTER REGARDING QUINTARA'S RESPONSES TO REQUESTS FOR PRODUCTION AND PREVIOUS MEET AND CONFER CORRESPONDENCE.	1.7	314.50
5/26/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING DENIAL OF MOTION FOR RECONSIDERATION OF COMPUTER INSPECTION RULING; REVIEW LOCAL RULES REGARDING AUTOMATIC DENIAL OF MAGISTRATE RULINGS AFTER 14 DAYS; REVIEW/ANALYZE SUBPOENA TO SEBOLD; REVIEW/ANALYZE SUBPOENA TO NOVOA; REVIEW MEMO FROM D. WISEMAN REGARDING DISQUALIFICATION OF T. KIMURA AS NON RETAINED EXPERT WITNESS; COMMUNICATIONS WITH A. JOHNSON REGARDING REVIEW OF QUINTARA'S DOCUMENT PRODUCTIONS; REVIEW STATUS OF DOCUMENT PRODUCTION REVIEW	2.5	937.50
5/26/21	ANJ	REVIEW QUINTARA DOCUMENTS.	1.2	648.00
5/26/21	DWW	REVIEW/ANALYSIS OF ANSWER TO WRIT PETITION; SUBPOENAS TO EXPERTS; TELEPHONE CONFERENCE WITH R. SEBOLD AND B. YANG-O'MALLEY REGARDING RULE 26 REBUTTAL REPORT; PREPARE OUTLINE FOR MOTION FOR TERMINATING SANCTIONS AND CONFERENCES WITH B. ELAM REGARDING SAME.	.4	60.00
5/26/21	KP	QUERY ADDITIONAL H. YISHEN KEYWORDS FOR RELATIVITY REVIEW; EMAIL CORRESPONDENCE WITH T. NG AND B. CARR.	5.3	3,286.00
5/26/21	TN	DISCUSS ISSUES WITH DAMAGES EXPERT; IDENTIFY RELEVANT DOCUMENTS	1.7	297.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	5/31/21 1076894 Page 10	
Date	Tkpr	Description of Services Rendered	Hours	Amount
5/26/21	BE	FOR DAMAGES EXPERT; REVIEW PLAINTIFF'S DOCUMENT PRODUCTION DRAFT MOTION FOR SANCTIONS. DISCUSS FACTUAL BACKGROUND AND ARGUMENTS FOR MOTION.	1.0	385.00
5/27/21	RMD	ANALYZE DISTRICT COURT'S ANSWER TO PETITION FOR WRIT OF MANDAMUS AND DRAFT EMAIL TO MR. WISEMAN ET AL. RE SAME.	3.5	1,312.50
5/27/21	BMC	DRAFT OBJECTIONS TO SEBOLD SUBPOENA; DRAFT OBJECTIONS TO NOVOA SUBPOENA; COMMUNICATIONS WITH D. WISEMAN REGARDING STATUS OF MOTION TO RECONSIDER FORENSIC EXAMINATION RULING BY DISCOVERY JUDGE; REVIEW/ANALYZE CASES REGARDING USE AND MISAPPROPRIATION OF TRADE SECRET FOR SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE SUMMARY JUDGMENT OUTLINE FROM D. WISEMAN; REVIEW ORDERS FROM JUDGE ALSUP REGARDING SUMMARY JUDGMENT; COMMUNICATIONS WITH T. NG REGARDING ZI DOCUMENT PRODUCTION; REVIEW/ANALYZE DEFENDANTS' COMPLIANCE WITH JUDGE TSE DISCOVERY ORDERS COMPELLING DOCUMENTS AND FURTHER DISCOVERY RESPONSES	.3	165.00
5/27/21	DWW	PREPARATION OF MOTION FOR TERMINATING SANCTION; REVIEW AND EDIT SEBOLD REPORT; REVIEW REBUTTAL REPORT FROM QUINTARA'S FORENSIC EXPR; TELEPHONE CONFERENCES WITH M. SEBOLD AND R. NAVOA; PREAPRE, REVISE AND EDIT OUTLINE FOR SUMMARY ADJUDICATION MOTION; REVIEW BRIEF BY JUDGE ALSUP REGARDING MARCH 13, 2021 ORDER.	5.6	3,024.00
5/27/21	KP	DOWNLOAD, EXTRACT, FIX IMAGES AND UPLOAD OPPOSING PRODUCTION QB010 TO RELATIVITY FOR REVIEW.	5.3	3,286.00
5/27/21	TN	REVIEW DOCUMENTS; CORRESPOND WITH CLIENT RE [REDACTED]; REVIEW COURT RESPONSE RE WRIT PETITION	3.8	665.00
5/27/21	BE	RESEARCH AND [REDACTED].	1.4	539.00
5/28/21	BMC	REVIEW MOTION FOR TERMINATING SANCTIONS	8.1	3,037.50
5/28/21	BMC	RESEARCH REGARDING [REDACTED]	.3	162.00
5/28/21	BMC	[REDACTED]	.6	324.00
5/28/21	BMC	REVIEW/ANALYZE SUMMARY JUDGMENT MOTION OUTLINE FROM D. WISEMAN	.3	162.00
5/28/21	ANJ	FURTHER REVIEW OF QUINTARA PRODUCTION.	2.2	330.00
5/28/21	DWW	REVIEW/REVISION OF OUTLINE FOR MOTION FOR TERMINATING SANCTIONS AND REVISE AND EDIT SAME; FINAL REVIEW OF SEBOLD REPORT; TELEPHONE CONFERENCE WITH G. WANG [REDACTED].	5.4	3,348.00
5/28/21	KP	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND UPLOAD C. ZHI DATA TO RELATIVITY; PREPARE AND PRODUCE RUIFENG-ZHI _001, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.	1.8	315.00
5/28/21	TN	[REDACTED]; PARTICIPATE IN CONFERENCE CALL WITH CLIENT; [REDACTED]	1.8	693.00
5/28/21	BE	DISCUSS MOTION FOR SANCTIONS REVISIONS AND DECLARATIONS. DRAFT DECLARATION FOR RENE NOVOA. CALL WITH RENE NOVOA TO DISCUSS DECLARATION. DRAFT DECLARATION FOR DYLAN WISEMAN. REVISE MOTION FOR SANCTIONS. RESEARCH [REDACTED].	4.4	1,650.00
5/29/21	TN	REVIEW AND RESPOND TO CLIENT CORRESPONDENCE; REVIEW MOTION FOR TERMINATING SANCTIONS	.8	308.00
5/30/21	BE	DISCUSS AND REVIEW REVISIONS TO MOTION FOR SANCTIONS AND DECLARATIONS.	.2	75.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 5/31/21 1076894 11 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
5/31/21	DWW	REVIEW/REVISION OF MOTION FOR TERMINATING SANCTION.	5.7	3,534.00
5/31/21	TN	REVIEW DOCUMENT PRODUCTION; CORRESPOND WITH PLAINTIFF RE THE SAME	.3	115.50
5/31/21	BE	REVISE MOTION FOR SANCTIONS AND DECLARATIONS IN SUPPORT THEREOF. ADD CITES TO DECLARATIONS AND EXHIBITS IN MOTION. DISCUSS MOTION AND FILING. RESEARCH AND [REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]	5.3	1,987.50

Date	Description of Disbursement	CheckNo	Units	Amount
4/16/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (09CA) ON 04/16/21			.20
4/16/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 04/16/21			1.70
4/23/21	PROCESS/COURT SERVICE FIRST LEGAL DEPOSITION SERVICES LLC COURT REPORTER, VIDEOGRAPHER, EXPEDITED DEPOSITION TRANSCRIPT OF QUN SHAN; TAKEN ON 04/14/21 - INV.# 64930	588789		2,939.68
4/26/21	DEPOSITION FEES FIRST LEGAL DEPOSITION SERVICES LLC COURT REPORTER, VIDEOGRAPHER, EXPEDITED DEPOSITION TRANSCRIPT OF XUELING ZHAO; TAKEN ON 04/13/21 - INV.# 64932	588789		3,492.10
4/30/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF ALEX WONG; TAKEN ON 04/21/21 - INV.# 1084504	588798		1,832.93
4/30/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY OF GANGYOU WANG'S DEPOSITION TRANSCRIPT, TAKEN ON 04/22/2021 - INV.# 1084580	588798		1,525.22
4/30/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY OF ALAN LI'S DEPOSITION TRANSCRIPT TAKEN ON 04.23.2021 - INV.# 1084768	588798		1,432.07
4/30/21	MESSENGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: BLACK MOUNTAIN HOLDINGS, 990 INDUSTRIAL RD., SUITE 207, SAN CARLOS, CA 94070 ON 4/22/21 - SA20199	588615		170.00
4/30/21	MESSENGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: TOMO KIMURA, 942 CERRITO ST., ALBANY, CA 94706 ON 4/22/21 - SAC20200	588615		192.75
4/30/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 04/02/21	588420		197.19
4/30/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 04/06/21	588420		25.75
4/30/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 04/20/21	588420		30.34
4/30/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 04/25/21	588420		50.09
4/30/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 5/31/21 1076894 Page 12

Date	Description of Disbursement	CheckNo	Units	Amount
5/04/21	PERFORMED BY WISEMAN,DYLAN ON 04/27/21 DEPOSITION FEES FIRST LEGAL DEPOSITION SERVICES LLC VIDEOGRAPHER FOR XUELING ZHAO'S DEPOSITON; TAKEN ON 04/13/21 - INV.# 65267	588420		30.34
5/14/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 4/09/21 ROUNDTRIP MILEAGE FROM SACRAMENTO TO SF FOR MR. WANG'S DEPOSITION PREP SESSION. (MILES 170.00)	588789		1,745.00
5/14/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 4/09/21 PARKING FOR DYLAN WISEMAN DURING DEPOSITION PREP SESSION FOR MR. WANG			97.75
5/14/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 4/22/21 ROUNDTRIP MILEAGE FROM SACRAMENTO TO SF FOR MR. WANG'S DEPOSITION. (MILES 170.00)			24.00
5/14/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 4/22/21 PARKING FOR DYLAN WISEMAN DURING THE DEPOSITION OF MR. WANG.			97.75
				24.00

Recap of Services	Hours	Effective Rate	Fees
ROBERT M. DATO	45.3	550.00	24,915.00
BRANDON M. CARR	72.0	540.00	38,880.00
ANTOINETTE N. JOHNSON	35.2	150.00	5,280.00
DYLAN WISEMAN	128.0	620.00	79,360.00
NILI YAVIN	1.5	185.00	277.50
KEVIN PARKER	66.9	175.00	11,707.50
TIFFANY NG	96.9	385.00	37,306.50
DAVID GOLDSTEIN	1.5	345.00	517.50
JOSHUA ROBBINS	.4	650.00	260.00
ED EPPRIGHT	1.7	185.00	314.50
BERIT ELAM	29.0	375.00	10,875.00
Total	478.4		209,693.50

Total Fees 209,693.50
Total Disbursements 13,908.86

Matter Total \$ 223,602.36

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

June 30, 2021
Invoice No. 1085211

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	436,896.18
Payments received through 07/30/21	227,202.68-
Previous Balance Remaining	209,693.50
Current Fees Through 06/30/21	234,326.00
Current Disbursements Through 06/30/21	10,722.26
Invoice Total	\$ 245,048.26
Balance Due	\$ 454,741.76

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard
go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
209,693.50	.00	.00	454,741.76

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/01/21	BMC	COMMUNICATIONS WITH D. PETERSON REGARDING INSPECTION OF ORIGINAL DOCUMENTS; REVIEW/ANALYZE CASE MANAGEMENT ORDER REGARDING EXPERT REPLY REPORTS; REVIEW/ANALYZE BERRYHILL EXPERT REBUTTAL REPORT; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTIONS; COMMUNICATIONS WITH D. PETERSON REGARDING CHARLES & ASSOCIATES AND HENRY HU DEPOSITIONS; REVIEW/ANALYZE REPLY IN SUPPORT OF WRIT OF MANDAMUS	3.9	2,106.00
6/01/21	ANJ	FURTHER REVIEW OF QUINTARA PRODUCTION.	.6	90.00
6/01/21	DWW	REVIEW/ANALYSIS OF DISCOVERY LETTER BRIEF ORDER FROM MAGISTRATE TSE; CORRESPONDENCE REGARDING DEPOSITION SCHEDULING.	.7	434.00
6/01/21	KP	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND UPLOAD C. ZHI DATA TO RELATIVITY; PREPARE AND PRODUCE RUIFENG-ZHI _002, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; SYNCHRONIZE GANGYOU WANG TRANSCRIPTS AND EXHIBITS AND UPLOAD TO CASENOTEBOOK.	2.6	455.00
6/01/21	TN	REVIEW BERRYHILL REBUTTAL REPORT; REVIEW CORRESPONDENCE RE NEXT STEPS; SPEAK WITH CLIENT RE [REDACTED]	.7	269.50
6/01/21	BE	DISCUSS AND PUT TOGETHER EXHIBITS TO MOTION FOR SANCTIONS. FINALIZE MOTION AND DECLARATIONS. DRAFT PROPOSED ORDER. DRAFT ADMINISTRATIVE MOTION TO SEAL, AND DECLARATION, AND PROPOSED ORDER IN SUPPORT THEREOF. CONDUCT FINAL REVIEW AND QC OF EXHIBITS AND MOTION DOCUMENTS. REVIEW LOCAL RULES.	5.5	2,062.50
6/02/21	BMC	REVIEW/ANALYZE PLAINTIFF'S RESPONSE TO COURT'S BRIEF CONCERNING WRIT OF MANDAMUS; COMMUNICATIONS WITH D. PETERSON REGARDING THIRD-PARTY AND EXPERT DEPOSITIONS; CONFERENCE WITH D. WISEMAN REGARDING CHARLES AND ASSOCIATES, HENRY HU AND T. KIMURA DEPOSITIONS; PREPARATION FOR CHARLES AND ASSOCIATES, HENRY HU AND T. KIMURA DEPOSITIONS; COMMUNICATIONS WITH T. NG REGARDING CHARLES AND ASSOCIATES, HENRY HU AND T. KIMURA DOCUMENTS FOR DEPOSITIONS; REVIEW ORDER REGARDING HU DOCUMENT SUBPOENA; REVIEW/ANALYZE DOCUMENTS TAGGED FOR ATTORNEY REVIEW BY A. JOHNSON FROM QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTIONS 7, 8 AND 9	6.5	3,510.00
6/02/21	ANJ	PREPARE SEARCHES FOR TRANSMITTAL OF DOCUMENTS TO B. CARR; DRAFT AND FINALIZE EMAIL REGARDING LACK OF ATTACHMENTS TO EMAILS; PREPARE TOMO DEPOSITION DOCUMENTS FOR B. CARR REVIEW.	3.2	480.00
6/02/21	TN	STRATEGIZE UPCOMING DEPOSITIONS FOR TOMO KIMURA, CHARLES ZHI, AND HENRY HU; SPEAK WITH CLIENT RE [REDACTED]; MANAGE DOCUMENT PRODUCTION; IDENTIFY TOMO KIMURA EXHIBITS	2.8	1,078.00
6/03/21	BMC	REVIEW ORDER FROM JUDGE TSE REGARDING INSPECTION OF DOCUMENTS; REVIEW/ANALYZE REQUEST FOR ADMISSIONS RELATED TO ORDER; MEETING WITH CLIENT ABOUT [REDACTED]; ATTEND DOCUMENT INSPECTION WITH CLIENT AND D. PETERSON; FOLLOW-UP COMMUNICATIONS WITH D. PETERSON REGARDING DOCUMENT INSPECTION AND AMENDING REQUESTS FOR ADMISSION	1.3	702.00
6/03/21	BMC	REVIEW/ANALYZE EXPERT REBUTTAL REPORT OF M. SEBOLD; REVIEW/ANALYZE TOMO KIMURA EXPERT DISCLOSURE; REVIEW/ANALYZE DOCUMENTS FROM T. NG TO USE FOR EXPERT DEPOSITION; PREPARATION FOR T. KIMURA DEPOSITION	3.2	1,728.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		6/30/21 1085211 2
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/03/21	BMC	PREPARATION FOR HENRY HU DEPOSITION; REVIEW/ANALYZE ALLEGATIONS ABOUT IMMIGRATION LAWYER IN FIRST AMENDED COMPLAINT	1.5	810.00
6/03/21	ANJ	ORGANIZE ADDITIONAL DEPOSITION DOCUMENTS AND BEGIN REVIEW OF QUINTARA'S LATEST DOCUMENT PRODUCTION.	4.6	690.00
6/03/21	KP	SYNCHRONIZE ALAN LI TRANSCRIPTS AND EXHIBITS AND UPLOAD TO CASENOTEBOOK; DOWNLOAD, EXTRACT, SYNCHRONIZE AND UPLOAD 59486 SHAN, QUN 041421 VIDEO TO CASENOTEBOOK.	2.7	472.50
6/03/21	TN	HANDLE DISCOVERY ISSUES; DISCUSS [REDACTED] WITH CLIENT; CORRESPOND WITH PLAINTIFF RE COMPUTER FORENSIC IMAGES; DISCUSS ISSUES WITH HAYSTACK	2.3	885.50
6/03/21	BE	REVIEW CORRESPONDENCE FROM QUINTARA'S COUNSEL REGARDING ALLEGED TRADE SECRETS IN COURT FILING.	.1	37.50
6/04/21	BMC	REVIEW/ANALYZE DOCUMENTS FROM QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTIONS AND DOCUMENTS TAGGED FOR ATTORNEY REVIEW BY A. JOHNSON; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL AND AMENDED RESPONSES TO REQUESTS FOR ADMISSIONS	2.5	1,350.00
6/04/21	BMC	RESEARCH REGARDING [REDACTED] [REDACTED]; RESEARCH REGARDING [REDACTED] [REDACTED]	2.7	1,458.00
6/04/21	BMC	REVIEW/ANALYZE DOCKET AND SCHEDULING ORDER REGARDING PRE-TRIAL DEADLINES	.4	216.00
6/04/21	ANJ	FURTHER REVIEW OF QUINTARA'S LATEST DOCUMENT PRODUCTION; REVIEW D. PETERSON'S RESPONSE TO LACK OF EMAIL ATTACHMENTS.	2.4	360.00
6/04/21	DWW	READ EMAIL FROM NG, TIFFANY F.: FW: RUIFENG [IW OV-BN.FID3231313]	.1	62.00
6/04/21	KP	DOWNLOAD, EXTRACT AND STAGE G. WANG, R. SHAO, YQ. CHEN, H. JIAO, T. OWENS AND D. ZHAO VIDEO DEPOSITIONS FROM APTUS.	3.9	682.50
6/04/21	TN	HANDLE COMPUTER IMAGES ISSUES AND CORRESPOND WITH PLAINTIFF RE THE SAME	.7	269.50
6/04/21	BE	DISCUSS AND PREPARE CORRECTED VERSIONS OF NOVOA DECLARATION, WISEMAN DECLARATION AND MOTION TO SEAL DOCUMENTS. REVIEW PROCEDURE FOR WITHDRAWING CONFIDENTIAL DOCUMENTS FROM ECF. DRAFT MOTION TO REMOVE DOCUMENTS FROM ECF.	3.4	1,275.00
6/06/21	TN	RESEARCH [REDACTED] [REDACTED]	1.4	539.00
6/07/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH B. ELAM REGARDING RESEARCH [REDACTED]; REVIEW/ANALYZE MEMO FROM D. WISEMAN REGARDING SUMMARY JUDGMENT ISSUES; RESEARCH [REDACTED] [REDACTED]	6.2	3,348.00
6/07/21	BMC	PREPARATION FOR CHARLES AND ASSOCIATES AND HENRY HU DEPOSITIONS; COMMUNICATIONS WITH T. NG AND D. WISEMAN REGARDING SAME	1.1	594.00
6/07/21	ANJ	FINALIZE REVIEW OF QUINTARA'S LATEST DOCUMENT PRODUCTION; SUMMARIZE DOCUMENTS FOR B. CARR.	2.3	345.00
6/07/21	DWW	CORRESPONDENCE WITH R. SCOTT REGARDING JUNE 4, 2021 HEARING.	.3	186.00
6/07/21	TN	CONTACT LANDLORD AND ALLSTATE RE INSURANCE ISSUE; PREPARE FOR HENRY HU AND CHARLES ZHI DEPOSITIONS; REVIEW CORRESPOND FROM PLAINTIFF RE DISCOVERY ISSUES; RESPOND TO CLIENT [REDACTED] HANDLE		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/07/21	BE	CHAIN OF CUSTODY DOCUMENT ISSUES; PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT	4.3	1,655.50
6/08/21	BMC	DISCUSS MOTION FOR SUMMARY JUDGMENT AND ARGUMENTS AND RESEARCH [REDACTED]. ANALYZE ARTICLE REGARDING UNCLEAN HANDS ARGUMENTS.	.9	337.50
6/08/21	BMC	ATTEND AND DEFEND DEPOSITION OF HENRY HU; REVIEW/ANALYZE IMMIGRATION DOCUMENTS USED IN DEPOSITION FOR SUMMARY JUDGMENT MOTION	4.5	2,430.00
6/08/21	BMC	COMMUNICATIONS WITH T. NG REGARDING 2019 FINANCIALS AND SUPPLEMENTAL DOCUMENT PRODUCTION	.2	108.00
6/08/21	BMC	ATTEND AND DEFEND DEPOSITION OF CHARLES AND ASSOCIATES; REVIEW/ANALYZE RUIFENG'S FINANCIAL STATEMENTS FOR USE IN DEPOSITION	3.2	1,728.00
6/08/21	ANJ	PREPARE FINANCIAL DEPOSITION EXHIBITS; PERFORM SEARCHES FOR SPECIFIC DOCUMENTS FOR DEPOSITION PREPARATION.	.6	90.00
6/08/21	DWW	CORRESPONDENCE WITH COUNSEL; TELEPHONE CONFERENCE WITH G. WANG REGARDING [REDACTED]	1.4	868.00
6/08/21	KP	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND UPLOAD C. ZHI DATA TO RELATIVITY; PREPARE AND PRODUCE RUIFENG-ZHI _003, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; DOWNLOAD, EXTRACT, TROUBLESHOOT AND FIX OPPOSING PRODUCTION QB011 AND UPLOAD TO RELATIVITY.	3.5	612.50
6/08/21	TN	SPEAK WITH CLIENT RE [REDACTED] CORRESPOND WITH HAYSTACK RE CHAIN OF CUSTODY DOCUMENT; ASSIST WITH DEPOSITION PREPARATION FOR HU AND ZHI; DISCUSS WITH ALLSTATE RE INSURANCE INFORMATION	3.3	1,270.50
6/09/21	BMC	REVIEW/ANALYZE OBJECTIONS TO BERRYLHILL SUBPOENA; REVIEW/ANALYZE OBJECTIONS TO T. KIMURA SUBPOENA; COMMUNICATIONS WITH T. NG REGARDING IMPROPER OBJECTIONS AND MEET AND CONFER ISSUES; REVIEW DISCOVERY ORDER FROM JUDGE TSE AND CONFER WITH T. NG REGARDING COMPLIANCE WITH ORDER; REVIEW CODE OF CONDUCT RULES CITED IN JUDGE TSE DISCOVERY ORDER; COMMUNICATIONS WITH B. ELAM REGARDING RESEARCH [REDACTED]; COMMUNICATIONS WITH D. WISEM AND AND T. NG REGARDING EXPERT DOCUMENT PRODUCTIONS	1.7	918.00
6/09/21	BMC	DRAFT SUMMARY JUDGMENT MOTION	6.5	3,510.00
6/09/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE WITH COUNSEL REGARDING DEPOSITION SCHEDULING AND COMPLIANCE WITH JUDGE TSE ORDERS.	1.2	744.00
6/09/21	TN	[REDACTED] WITH CLIENT; FOLLOW UP ON VARIOUS PENDING DISCOVERY ISSUES	1.7	654.50
6/09/21	BE	REVIEW AND ANALYZE QUINTARA'S DECLARATION IN SUPPORT OF MOTION TO SEAL AND NEW PROPOSED ORDER, AND JUDGE TSE'S ORDER REGARDING DISCOVERY LETTER BRIEF. PREPARE PROOF OF COMPLIANCE WITH JUDGE'S ORDER ON PROFESSIONAL CONDUCT. DISCUSS AND CONDUCT RESEARCH FOR [REDACTED]	2.9	1,087.50
6/10/21	BMC	REVIEW REVISED SUBPOENA TO T. KIMURA; COMMUNICATIONS WITH A. SMITH REGARDING SAME AND BERRYLHILL SUBPOENA; COMMUNICATIONS WITH B. ELAM REGARDING [REDACTED] RESEARCH; COMMUNICATIONS		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/10/21	BMC	WITH D. PETERSON REGARDING BERRYHILL DEPOSITION	.6	324.00
6/10/21	BMC	DRAFT SUMMARY JUDGMENT MOTION; RESEARCH REGARDING [REDACTED]	6.5	3,510.00
6/10/21	BMC	COMMUNICATIONS WITH A. JOHNSON REGARDING PREPARING SUMMARY OF DOCUMENT QUINTARA CLAIMS ARE ITS TRADE SECRET FOR JUDGE ALSUP; COMMUNICATIONS WITH A. JOHNSON REGARDING QUINTARA'S TENTH DOCUMENT PRODUCTION	.4	216.00
6/10/21	ANJ	REVIEW OF M. SEBOLD FILES FOR PRODUCTION; CONFERENCE WITH B. CARR REGARDING PREPARATION FOR MOTION FOR SUMMARY JUDGMENT.	5.9	885.00
6/10/21	KP	DOWNLOAD, STAGE, PROCESS AND UPLOAD "SEBOLD EXHIBITS" AND CLIENT DATA COLLECTED FROM HAYSTACK TO RELATIVITY FOR REVIEW AND PRODUCTION; EMAIL CORRESPONDENCE WITH T. NG AND A. JOHNSON.	3.7	647.50
6/10/21	TN	REVIEW EXPERT DOCUMENT PRODUCTION; HANDLE CHAIN OF CUSTODY ISSUES	3.7	1,424.50
6/10/21	BE	DISCUSS MEET AND CONFER ON KIMURA AND BERRYHILL'S RESPONSES TO SUBPOENA. DISCUSS AND CONDUCT RESEARCH FOR [REDACTED] REGARDING [REDACTED]	5.3	1,987.50
6/11/21	BMC	REVIEW/ANALYZE DISCOVERY RESPONSES FOR EVIDENCE FOR SUMMARY JUDGMENT; DRAFT/REVISE SUMMARY JUDGMENT MOTION;	5.9	3,186.00
6/11/21	ANJ	COMMUNICATIONS WITH T. NG REGARDING PRODUCTION OF EXPERTS' FILES BEGIN REVIEW OF HAYSTACK DOCUMENTS.	6.1	915.00
6/11/21	KP	EMAIL CORRESPONDENCE WITH T. NG AND N. YAVIN; SYNCH AND UPLOAD TRE092554 20210505 CHEN, YI QING DEPOSITION TO CASENOTEBOOK	1.4	245.00
6/11/21	TN	REVIEW EXPERT DOCUMENT PRODUCTION; RESOLVE ISSUES RELATED TO RUIFENG BIZTECH EMAIL COLLECTION; CORRESPOND WITH CLIENT RE THE SAME	4.7	1,809.50
6/11/21	BE	DISCUSS AND CONDUCT RESEARCH FOR [REDACTED] REGARDING [REDACTED]	1.3	487.50
6/12/21	TN	REVIEW EXPERT DOCUMENT PRODUCTION	2.3	885.50
6/13/21	TN	CONTINUE TO REVIEW EXPERT DOCUMENT PRODUCTION	1.9	731.50
6/14/21	BMC	CONFERENCE WITH D. WISEMAN AND T. NG REGARDING SUMMARY JUDGMENT, DOCUMENT PRODUCTIONS AND DISCOVERY ISSUES; COMMUNICATIONS WITH T. NG REGARDING EXPERT DOCUMENT PRODUCTIONS	.7	378.00
6/14/21	BMC	REVIEW/ANALYZE QUINTARA'S DISCOVERY RESPONSES FOR USE IN SUMMARY JUDGMENT MOTION; CONFERENCE WITH A. JOHNSON REGARDING PREPARATION OF SUMMARY OF THE DOCUMENTS QUINTARA IDENTIFIED AS ITS TRADE SECRET FOR SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH C. ZHI REGARDING SBC EMAIL ACCOUNT SEARCH FOR EMAILS WITH S. ZHAO	2.5	1,350.00
6/14/21	BMC	DRAFT SUMMARY JUDGMENT MOTION	4.5	2,430.00
6/14/21	ANJ	FURTHER REVIEW EXPERT DOCUMENTS AND COORDINATE WITH T. NG.	1.9	285.00
6/14/21	ANJ	BEGIN REVIEW AND ANALYSIS OF FIRST 922 DOCUMENTS IDENTIFIED BY PLAINTIFF AS TRADE SECRET DOCUMENTS AND BEGIN DRAFT CHART FOR MOTION FOR SUMMARY JUDGMENT.	5.9	885.00
6/14/21	DWW	PREPARATION FOR DEPOSITION OF KIMURA; STATUS UPDATE CONFERENCE		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		6/30/21 1085211 5
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/14/21	KP	WITH LITIGATION TEAM.	2.4	1,488.00
6/14/21	TN	DOWNLOAD, EXTRACT, PROCESS AND UPLOAD XUELING ZHAO DATA COLLECTIONS FROM HAYSTACK TO RELATIVITY FOR REVIEW AND PRODUCTION.	4.7	822.50
6/14/21	TN	DISCUSS ISSUES WITH HAYSTACK RE CHAIN OF CUSTODY; PARTICIPATE IN CLIENT CALL TO DISCUSS [REDACTED]	1.7	654.50
6/14/21	BE	FINALIZE EXPERT DOCUMENT PRODUCTION; DISCUSS VARIOUS DOCUMENT COLLECTION ISSUES WITH HAYSTACK	5.3	2,040.50
6/14/21	BE	CONDUCT RESEARCH FOR [REDACTED] REGARDING [REDACTED] [REDACTED] [REDACTED]. STATUS CALL REGARDING MSJ AND DISCOVERY ISSUES. REVIEW CORRESPONDENCE REGARDING DISCOVERY ORDERS AND DEADLINES.	7.1	2,662.50
6/15/21	BMC	REVIEW/ANALYZE CHALLENGE TO CONFIDENTIAL DESIGNATIONS BY D. PETERSON; COMMUNICATIONS WITH D. PETERSON REGARDING SAME; COMMUNICATIONS WITH A. LI REGARDING COMPUTER PASSWORDS AND SECURITY; COMMUNICATIONS WITH HAYSTACK REGARDING FORENSIC ANALYSIS FOR SUMMARY JUDGMENT MOTION; REVIEW STIPULATED PROTECTIVE ORDER REGARDING DE-DESIGNATION CHALLENGE; REVIEW/ANALYZE DOCUMENTS FOUND ON DEFENDANTS' COMPUTERS THAT ARE DESIGNATED AS QUINTARA'S TRADE SECRET FILES; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	2.5	1,350.00
6/15/21	BMC	DRAFT SUMMARY JUDGMENT MOTION	5.4	2,916.00
6/15/21	ANJ	FURTHER REVIEW OF PLAINTIFF'S INITIAL TRADE SECRET DOCUMENTS IN PREPARATION FOR MOTION FOR SUMMARY JUDGMENT; CONFERENCE WITH D. WISEMAN REGARDING DOCUMENT PRODUCTION; SERVE EXPERT DOCUMENT PRODUCTIONS.	5.1	765.00
6/15/21	DWW	PREPARATION FOR DEPOSITION OF KIMURA; CONFERENCE CALL WITH R. SHAO REGARDING [REDACTED]	3.4	2,108.00
6/15/21	KP	PREPARE AND PRODUCE HAYSTACK AND SEBOLD EXPERT PRODUCTIONS, FINALIZE AND UPLOAD TO SHAREFILE FOR TRANSFER. EMAIL AND TELECONFERENCE WITH A. JOHNSON AND B. CARR; QUERY AND PROVIDE DOCUMENTS AND MATADATA FOR OPPOSING PRODUCED "PROCESSED_ORDERS_01-2021.XLSX" OR "PROCESSED_ORDERS.XLSX" DOCUMENTS PER B. CARR.	7.0	1,225.00
6/15/21	TN	REVIEW CORRESPONDENCE RELATED TO DISCOVERY ISSUES; FURTHER CONSIDER OUTSTANDING DISCOVERY ISSUES	1.0	385.00
6/15/21	BE	RESEARCH [REDACTED] [REDACTED] DISCUSS DECLARATIONS AND MOTION TO SEAL PREPARATION FOR SUMMARY JUDGMENT MOTION. DISCUSS MEET AND CONFER LETTER REGARDING KIMURA'S OBJECTIONS AND RESPONSES TO SUBPOENA. DRAFT MEET AND CONFER LETTER. RECEIVE PLAINTIFF'S OPPOSITION TO MOTION FOR TERMINATING SANCTIONS AND DISCUSS SAME.	4.9	1,837.50
6/16/21	BMC	REVIEW/ANALYZE DEPOSITION OF CORENA CLARK OF BLACK MOUNTAIN FOR TESTIMONY TO USE IN SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE DEPOSITION OF TIFFANY OWENS OF BLACK MOUNTAIN FOR TESTIMONY TO USE IN SUMMARY JUDGMENT MOTION;	2.4	1,296.00
6/16/21	BMC	DRAFT SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE IMMIGRATION		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 6	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/16/21	BMC	APPLICATION FORMS SIGNED BY X. SHAO FOR SUMMARY JUDGMENT MOTION REVIEW/ANALYZE OPPOSITION TO MOTION FOR TERMINATING SANCTIONS FOR USE IN SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH K. PARKER REGARDING FORENSICS AND METADATA FOR DEFENDANTS' TRADE SECRET FILES; COMMUNICATIONS WITH HAYSTACK REGARDING FORENSIC INFO ON DEFENDANTS' TRADE SECRET FILES; REVIEW LETTER FROM D. PETERSON REGARDING COMPUTER FORENSIC ISSUES	3.8	2,052.00
6/16/21	ANJ	COORDINATE WITH IT FOR ASSISTANCE WITH SQL FILES; FURTHER REVIEW OF ADDITIONAL 10,000 DOCUMENT AND REVISIONS TO CHART OF TRADE SECRET DESIGNATED DOCUMENTS FOR MOTION FOR SUMMARY JUDGMENT	1.8	972.00
6/16/21	ANJ	REVIEW REQUESTS FOR ADMISSIONS AND RESPONSES AND BEGIN DRAFT OF CHART; COORDINATE EXHIBITS TO REQUESTS FOR ADMISSIONS, SET THREE.	4.6	690.00
6/16/21	ANJ	REVIEW CLIENT EMAILS FOR RELEVANCE AND PRODUCTION.	3.8	570.00
6/16/21	DWW	PREPARATION FOR MEET AND CONFER LETTER TO COUNSEL FOR QUINTARA REGARDING OBJECTIONS TO KIMURA SUBPOENA; REVIEW QUINTARA'S OPPOSITION TO MOTION FOR TERMINATING SANCTIONS; TELEPHONE CONFERENCE WITH R. NOVOA REGARDING SAME; PREPARE OUTLINE FOR REPLY BRIEF; REVIEW SEARCH TERMS FOR ADDITIONAL EMAIL MESSAGE; TELEPHONE CONFERENCE R. SHAO REGARDING [REDACTED]; REVISE AND EDIT REPLY BRIEF REGARDING TERMINATING SANCTIONS; PREPARE FOR T. KIMURA DEPOSITION.	.6	90.00
6/16/21	KP	EMAIL CORRESPONDENCE WITH B. CARR AND T. NG; PROCESS CLIENT DOCUMENT TO PROVIDE SPECIFIC DATE METADATA PER D. WISEMAN; STAGE "HIRING DOCUMENTS" CLIENT DATA, PROCESS AND UPLOAD TO RELATIVITY; DOWNLOAD, STAGE, PROCESS AND UPLOAD 20210614 FILE LISTINGS (HAYSTACK) DATA TO RELATIVITY; DOWNLOAD, STAGE AND PROCESS 20210616 A.WONG & A. LI EMAILS (HAYSTACK) DATA AND UPLOAD TO RELATIVITY.	5.2	3,224.00
6/16/21	TN	ANALYZE FILE LISTING; CONSIDER LITIGATION ISSUES; CORRESPOND WITH CLIENT RE [REDACTED]; DRAFT EMAIL TO OPPOSING COUNSEL RE FILE LISTING	9.2	1,610.00
6/16/21	TN	RESPOND TO CLIENT [REDACTED]; DISCUSS DISCOVERY ISSUES WITH HAYSTACK; MANAGE DOCUMENT COLLECTION	1.8	693.00
6/16/21	BE	DISCUSS STRATEGY FOR REPLY BRIEF ON MOTION FOR TERMINATING SANCTIONS.	.9	346.50
6/17/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION; RESEARCH REGARDING [REDACTED] RESEARCH REGARDING [REDACTED]	.2	75.00
6/17/21	BMC	[REDACTED]	5.9	3,186.00
6/17/21	ANJ	REVIEW/ANALYZE FILES QUINTARA CLAIMS ARE TRADE SECRET FOR SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE ADMISSIONS FROM QUINTARA FOR SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH HAYSTACK REGARDING FORENSIC ANALYSIS OF FILES ON RUIFENG'S COMPUTERS; COMMUNICATIONS WITH D. WISEMAN REGARDING SUMMARY JUDGMENT MOTION AND REPLY TO MOTION FOR TERMINATING SANCTIONS; COMMUNICATIONS WITH K. BACON REGARDING DEFENDANTS' TRADE SECRET FILES; COMMUNICATIONS WITH T. NG REGARDING DOCUMENTS RECEIVED FROM RUIFENG'S ACCOUNTANT	1.9	1,026.00
		REVIEW CLIENT EMAILS FOR RESPONSIVE DOCUMENTS FOR PRODUCTION.	1.9	285.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		6/30/21 1085211 7
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/17/21	ANJ	FURTHER REVISIONS TO TRADE SECRET CHART FOR MOTION FOR SUMMARY JUDGMENT; FINALIZE CHART FOR ATTORNEY REVIEW.	3.3	495.00
6/17/21	DWW	REVIEW/REVISION OF WISEMAN REPLY DECLARATION REGARDING MOTION FOR TERMINATING SANCTIONS; PREPARE AND EDIT NOVOA DECLARATION REGARDING MOTION FOR TERMINATING SANCTIONS; REVISE AND EDIT REPLY BRIEF; PREPARE FOR WITNESS DEPOSITIONS.	6.1	3,782.00
6/17/21	KP	EMAIL CORRESPONDENCE WITH T. NG; APPLY PERSONAL EMAIL SEARCH TERMS LIST ACROSS HAYSTACK COLLECTED CLIENT EMAILS AND PROVIDE RELATIVITY REVIEW SEARCH FOR PRODUCTION PER T. NG; STAGE, PROCESS, TROUBLESHOOT PASSWOD ISSUES AND UPLOAD ADDITIONAL "HIRING DOCUMENTS" TO RELATIVITY FOR PRODUCTION; DOWNLAOD, STAGE, PROCESS AND UPLOAD R. SHAO EMAIL DATA FROM HAYSTACK TO RELATIVITY; APPLY SEARCH TERMS ACROSS CLIENT EMAIL AND PROVIDE RELATIVITY PRODUCTION REVIEW SEARCHES; PREPARE OPPOSING COUNSEL "QB009791 – 9858" DOCUMENTS AND UPLOAD TO SHAREFILE FOR TRANSFER TO HAYSTACK PER B. CARR.	11.2	1,960.00
6/17/21	TN	HANDLE EMAIL COLLECTION ISSUES AND RELEVANT SEARCH TERMS; DISCUSS DISCOVERY ISSUES WITH CLIENT; REVIEW ALAN AND ALEX EMAIL COLLECTION; FINALIZE DOCUMENT PRODUCTION PER COURT ORDER; REVIEW VARIOUS DOCUMENTS COLLECTED FROM DEFENDANTS' ELECTRONIC DEVICES; DISCUSS UPCOMING DEPOSITION STRATEGY; DISCUSS ISSUES WITH FINANCIAL DAMAGES EXPERT	7.4	2,849.00
6/17/21	DG	BEGIN WORK REVISING ALL CITATIONS TO LEGAL AUTHORITY IN MSA MEMORANDUM OF POINTS AND AUTHORITIES.	1.5	517.50
6/17/21	BE	DISCUSS PLAINTIFF'S OPPOSITION TO MOTION FOR TERMINATING SANCTIONS. DRAFT NOVOA AND WISEMAN DECLARATIONS IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION. DISCUSS MOTION TO SEAL TO BE FILED WITH MOTION FOR SUMMARY ADJUDICATION. REVIEW PLAINTIFF'S OPPOSITION AND DRAFT REPLY IN SUPPORT OF MOTION FOR TERMINATING SANCTIONS. RESEARCH [REDACTED] REGARDING [REDACTED].	4.2	1,575.00
6/18/21	ANJ	RELATIVITY SEARCHES FOR SSF REACTIONS EXCEL SPREADSHEETS; REVIEW RUIFENG EMAILS FOR RESPONSIVENESS AND PRODUCTION	1.2	180.00
6/18/21	DWW	ATTENDANCE AT MEETING AT SF OFFICE WITH G. WANG REGARDING [REDACTED] TELEPHONE CONFERENCE WITH A. LI, C. CHEN, A. WONG, AND R. SHAO REGARDING [REDACTED]	7.1	4,402.00
6/18/21	KP	PREPARE FOR CONTINUED WITNESS DEPOSITIONS.		
6/18/21	KP	EMAIL CORRESPONDENCE WITH T. NG; PREPARE AND PRODUCE CLIENT PRODUCTION RUIFENG010 AND RUIFENG011, ENCRYPT AND UPLOAD TO SHAREFILE FOR DELIVERY; STAGE AND PROCESS 20210617 CHARLES ZHI DOCUMENTS & TAX DOCUMENTS AND UPLOAD TO RELATIVITY FOR PRODUCTION; PREPARE AND PRODUCE CLIENT PRODUCTION RUIFENG-ZHI_005, ENCRYPT AND UPLOAD TO SHAREFILE FOR DELIVERY; TROUBLESHOOT CLIENT DOCUMENT PRODUCTION ISSUES; DOWNLOAD AND EXTRACT HAYSTACK COLLECTED MOBILE REPORTS.	8.0	1,400.00
6/18/21	TN	ATTEND CLIENT MEETING; REVIEW CLIENT EMAILS AND TEXTS FOR PRODUCTION; EVALUATE ANONYMOUS LETTER RE CHRISTINE CHEN; REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL	6.6	2,541.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		6/30/21 1085211 Page 8
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/18/21	DG	PREPARE MOTION TO SEAL MSA NOTICE, MPA, DECLARATIONS, AND PROPOSED ORDER; FINALIZE WORK REVISING CITATIONS TO LEGAL AUTHORITY IN MSA MEMORANDUM.	3.5	1,207.50
6/18/21	BE	DISCUSS EXHIBITS TO MOTION FOR SUMMARY ADJUDICATION. DISCUSS REPLY IN SUPPORT OF MOTION FOR SANCTIONS. REVIEW MEET AND CONFER CORRESPONDENCE FROM PLAINTIFF REGARDING KIMURA SUBPOENA.	.3	112.50
6/19/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION	5.5	2,970.00
6/19/21	ANJ	REVIEW S. ZHAO'S RUIFENG EMAILS FOR RESPONSIVENESS AND PRODUCTION.	4.4	660.00
6/19/21	BE	DRAFT REPLY IN SUPPORT OF MOTION FOR SANCTIONS.	4.2	1,575.00
6/20/21	ANJ	REVIEW OF S. ZHAO'S RUIFENG EMAILS FOR RESPONSIVENESS AND PRODUCTION.	5.3	795.00
6/20/21	TN	REVIEW DOCUMENTS FOR PRODUCTION	.4	154.00
6/21/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE X. ZHAO DEPOSITION FOR SUMMARY JUDGMENT; REVIEW/ANALYZE BLACK MOUNTAIN DEPOSITIONS FOR SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH T. NG REGARDING C. ZHI DOCUMENT PRODUCTION; REVIEW MEET AND CONFER FROM D. PETERSON REGARDING T. KIMURA PRIVILEGE WAIVER	6.5	3,510.00
6/21/21	BMC	COMMUNICATIONS WITH HAYSTACK REGARDING FORENSIC ANALYSIS	.4	216.00
6/21/21	ANJ	REVIEW AND ANALYZE PASSWORD PROTECTED FILES AND RUIFENG FINANCIALS.	.9	135.00
6/21/21	DWW	PREPARATION FOR T. KIMURA DEPOSITION; CORRESPONDENCE WITH R. NOVOA REGARDING OPINIONS; REVISE AND EDIT REPLY BRIEF TO MOTION FOR TERMINATING SANCTIONS.	5.7	3,534.00
6/21/21	KB	PROOFREAD DEFENDANTS' REPLY TO PLAINTIFF'S OPPOSITION TO MOTION FOR TERMINATING OR ISSUE SANCTIONS, OPPOSITION TO PLAINTIFF'S CROSS MOTION FOR SANCTIONS.	.8	52.00
6/21/21	KP	STAGE, PROCESS AND UPLOAD EXPERT MR. BERRYHILL FILE LISTINGS TO RELATIVITY FOR REVIEW; ENCRYPT AND UPLOAD BERRYHILL AND KIMURA EXPERT PRODUCTIONS TO SHAREFILE FOR TRANSFER TO EXPERT PER T. NG; QUERY CLIENT "SSF REACTIONS" DOCUMENTS, PREPARE AND PRODUCE AS CLIENT PRODUCTION RUIFENG012 AND UPLOAD TO SHAREFILE FOR DELIVERY; EXPORT PDF VERSION OF RUIFENG012 AND SEND TO D. WISEMAN FOR DEPOSITION PREPARATION; PREPARE AND PRODUCE RUIFENG013 AND RUIFENG014, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.	11.2	1,960.00
6/21/21	TN	FINALIZE REVIEW OF RUIFENGBIZTECH EMAIL COLLECTION; GATHER FINANCIAL DOCUMENTS; CORRESPOND WITH CHARLES ZHI; REVIEW FILES SENT BY CHARLES ZHI; REVIEW SUMMARY JUDGMENT MOTION DRAFT; DISCUSS [REDACTED] WITH CLIENT	6.2	2,387.00
6/21/21	BE	REVIEW MEET AND CONFER CORRESPONDENCE REGARDING KIMURA SUBPOENA. DISCUSS REPLY BRIEF IN SUPPORT OF MOTION FOR SANCTIONS AND REVIEW FINAL DRAFT. RESEARCH AND DISCUSS [REDACTED] REGARDING [REDACTED]. RESEARCH CASE LAW FOR [REDACTED]		
		[REDACTED]	5.2	1,950.00
6/22/21	BMC	DRAFT/REVISE MOTION FOR SUMMARY JUDGMENT	4.5	2,430.00
6/22/21	BMC	DRAFT/REVISE DECLARATION OF D. WISEMAN IN SUPPORT OF MOTION FOR		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 9	
Date	Tkpr	Description of Services Rendered	Page	
			Amount	
6/22/21	ANJ	SUMMARY JUDGMENT	3.5	1,890.00
6/22/21	ANJ	REVIEW PRODUCTIONS FOR RUIFENG FINANCIAL DOCUMENTS.	.3	45.00
6/22/21	DWW	PREPARATION FOR AND TAKE T. KIMURA DEPOSITION.	7.9	4,898.00
6/22/21	KP	EMAIL CORRESPONDENCE WITH T. NG; INVESTIGATE PASSWORD PROTECTED CLIENT PRODUCED DOCUMENTS; DOWNLOAD, EXTRACT C. CORENA, H. HU, C. ZHI VIDEO DEPOSITIONS AND STAGE FOR UPLOAD TO CASENOTEBOOK; QUERY, EXPORT AND TRANSFER "ZHI004 FINANCIAL DOCUMENTS" TO D. WISEMAN PER T. NG.	3.8	665.00
6/22/21	TN	HANDLE VARIOUS ISSUES INCLUDING CORRESPOND WITH FINANCIAL EXPERT; REVIEW DOCUMENTS; ASSIST WITH TOMO KIMURA DEPOSITION; CONSIDER NEXT STEPS IN LITIGATION; DISCUSS ISSUES WITH HAYSTACK	3.6	1,386.00
6/22/21	TN	***NO CHARGE***: ATTEND TOMO KIMURA DEPOSITION	2.0	
6/22/21	BE	FINALIZE REPLY IN SUPPORT OF MOTION FOR SANCTIONS. DISCUSS AND DRAFT DECLARATIONS IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION.	3.0	1,125.00
6/23/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION	4.5	2,430.00
6/23/21	BMC	DRAFT/REVISE DECLARATION OF D. WISEMAN IN SUPPORT OF SUMMARY JUDGMENT; COMMUNICATION WITH A. JOHNSON REGARDING COMPILING EXHIBITS TO DECLARATION	2.5	1,350.00
6/23/21	BMC	DRAFT/REVISE DECLARATION OF R. NOVOA IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; REVIEW/COMPILE EXHIBITS TO DECLARATION	1.8	972.00
6/23/21	ANJ	COMPILE VOLUMIONUS EXHIBITS TO D. WISEMAN SUMMARY ADJUDICATION/JUDGMENT DECLARATION.	4.8	720.00
6/23/21	DWW	PREPARATION FOR AND DEFEND DEPOSITION OF M. SEBOLD; TELEPHONE CONFERENCE WITH R. NOVOA REGARDING STATUS OF FORENSIC REVIEW; REVIEW, REVISE AND EDIT MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION; CORRESPONDENCE WITH B. ELAM REGARDING MOTION TO EXCLUDE KIMURA AS NON-RETAINED EXPERT; REVIEW AND EDIT CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING ALLEGED DEFECTS FOR FORENSIC COLLECTION.	5.4	3,348.00
6/23/21	KP	EMAIL CORRESPONDENCE WITH D. WISEMAN; CASENOTEBOOK INSTALL FOR D. WISEMAN; UPLOAD TRE094826 20210507 WANG, GANGYOU, TRE093174 20210506 SHAO, RUI AND TRE096229 20210512 OWENS, TIFFANY DEPOSITIONS TO CASENOTEBOOK.	2.9	507.50
6/23/21	TN	RESEARCH [REDACTED] CONSIDER NEXT STEPS IN LITIGATION; REVIEW VARIOUS CORRESPONDENCE FROM OPPOSING COUNSEL; PREPARE WRITTEN RESPONSE RE EXPERT ISSUES	4.6	1,771.00
6/23/21	BE	DISCUSS MOTION TO EXCLUDE KIMURA AS NON-RETAINED EXPERT. DISCUSS MOTION FOR SUMMARY JUDGMENT. DISCUSS DEPOSITION OF DEFENDANTS' EXPERT. DRAFT ALAN LI DECLARATION IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT.	2.4	900.00
6/24/21	BMC	CONFERENCE CALL WITH CLIENT AND D. WISEMAN REGARDING [REDACTED]	1.0	540.00
6/24/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT; DRAFT DECLARATION OF D. WISEMAN IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; DRAFT DECLARATION OF A. LI IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; DRAFT DECLARATION OF R. NOVOA IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; CONFERENCE WITH A. JOHNSON REGARDING EXHIBITS IN SUPPORT OF		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 10	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/24/21	ANJ	MOTION FOR SUMMARY JUDGMENT	5.9	3,186.00
6/24/21	DWW	PREPARE CONFIDENTIAL DOCUMENT CHART FOR MOTION TO SEAL; RUN SEARCHES FOR PARTICULAR SPREADSHEET; COMPILE R. NOVOA, G. WANG, A. LI AND A. WONG DECLARATION EXHIBITS.	6.0	900.00
6/24/21	KP	ATTENDANCE AT DEPOSITIONS AND DEFEND OF ZHAO, WONG, AND CHEN; REVIEW AND EDIT MOTION FOR SUMMARY ADJUDICATION.	8.4	5,208.00
6/24/21	TN	UPLOAD OPPOSING COUNSEL EXPERT PRODUCTIONS "BERRYHILL AND KIMURA" TO RELATIVITY; UPLOAD TRE094976 20210510 JIAO, HAILONG AND TRF098007 20210513 ZHAO, PH.D., DEHUA DEPOSITIONS TO CASENOTEBOOK.	3.0	525.00
6/24/21	BE	WORK ON DECLARATIONS IN SUPPORT OF SUMMARY JUDGMENT MOTION; REVIEW VARIOUS CORRESPONDENCE RE LITIGATION STRATEGY AND EXISTING ISSUES; PARTICIPATE IN CLIENT CALL; [REDACTED]	3.8	1,463.00
6/25/21	BMC	DISCUSS MOTION FOR SANCTIONS. DISCUSS MOTION FOR SUMMARY JUDGMENT. CALL WITH RUIFENG TEAM REGARDING DEPOSITIONS AND STRATEGY.	1.1	412.50
6/25/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION, ACCOMPANYING DECLARATIONS, MOTION TO SEAL; REVIEW/ANALYZE REVISIONS TO SUMMARY JUDGMENT FROM D. WISEMAN; REVIEW/ANALYZE WHAT PORTIONS OF MEMO AND DECLARATIONS NEED TO BE SEALED; COMMUNICATIONS WITH A. JOHNSON REGARDING COMPILING EXHIBITS TO DECLARATIONS	6.9	3,726.00
6/25/21	BMC	REVIEW AND SEARCH QUINTARA'S DOCUMENT PRODUCTION FOR NDA'S EMPLOYEE HANDBOOK AND CONFIDENTIALITY AGREEMENTS	.4	216.00
6/25/21	ANJ	REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL RESPONSES TO WANG'S SPECIAL INTERROGATORIES, SET ONE; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	.5	270.00
6/25/21	DWW	LENGTHY CONFERENCES B.CARR AND D. GOLDSTEIN REGARDING MOTION FOR SUMMARY JUDGMENT; FINALIZE CHART FOR DOCUMENTS TO BE SEALED; FURTHER PREPARATION OF EXHIBITS TO D. WISEMAN DECLARATION; DOWNLOAD BERRYHILL DOCUMENTS FOR DEPOSITION PREPARATION.	4.2	630.00
6/25/21	KB	ATTENDANCE AT AND DEFEND DEPOSITIONS OF A. LI AND ALEX WONG; REVIEW, REVISE AND EDIT MOTION FOR SUMMARY ADJUDICATION; REVIEW RULING FROM COURT REGARDING IN PERSON HEARING FOR JULY 20, 2021; CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING NON-COMPLIANCE WITH MAGISTRATE JUDGE TSE'S RULINGS; REVIEW SUPPLEMENTAL INTERROGATORY RESPONSE; TELEPHONE CONFERENCE WITH B. CARR REGARDING QUINTARA'S UNTIMELY ATTEMPT TO SUPPLEMENT EXPERT REPORTS; PREPARE CORESPONDENCE TO COUNSEL OF QUINTARA REGARDIN SAME.	6.4	3,968.00
6/25/21	KP	PROOFREAD DEFENDANTS' MOTION FOR SUMMARY ADJUDICATION, EMAIL CORRESPONDENCE WITH T. NG; QUERY, EXPORT NATIVES AND TRANSFER QB RELEVANT DOCUMENTS FOR DEPOSITION AND SEND TO D. WISEMAN; QUERY AND EXPORT QB NATIVE DOCUMENTS AND TRANSFER TO HAYSTACK PER T. NG.	1.3	84.50
6/25/21	TN	PARTICIPATE IN CLIENT MEETING; WORK ON SUMMARY JUDGMENT MOTION; WRITE MEET AND CONFER LETTER RE TOMO KIMURA ISSUES; DISCUSS DATA	2.2	385.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		6/30/21 1085211 Page 11
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/25/21	DG	SEARCH WITH VENDOR	3.8	1,463.00
6/25/21	DG	WORK ON ADMINISTRATIVE MOTION TO SEAL MOTION FOR SUMMARY ADJUDICATION, DECLARATION OF WISEMAN IN SUPPORT OF MOTION TO SEAL, AND PROPOSED ORDER.	2.5	862.50
6/26/21	ANJ	REVIEW AND INSERT CITATIONS IN THE MEMORANDUM OF POINTS AND AUTHORITIES; REVISE WISEMAN DECLARATION IN SUPPORT OF SAME.	4.8	720.00
6/26/21	DWW	REVIEW/REVISION OF SUMMARY ADJUDICATION MOTION; REVIEW AND ANNOTATE KIMURA DEPOSITION TRANSCRIPT; TELEPHONE CONFERENCE WITH B. CARR REGARDING SAME.	4.3	2,666.00
6/26/21	TN	REVIEW SUMMARY JUDGMENT MOTION; IDENTIFY EXCERPTS TO USE IN RICHARD SHAN AND XUELING ZHAO'S DEPOSITION TRANSCRIPT	2.4	924.00
6/27/21	DWW	REVIEW/ANALYSIS OF SUMMARY ADJUDICATION; PREPARE FOR BERRYHILL DEPOSITION.	2.7	1,674.00
6/27/21	TN	REVISE CLIENT DECLARATIONS; CORRESPOND WITH CLIENT [REDACTED]	.3	115.50
6/28/21	BMC	REVIEW PLAINTIFF'S CORRESPONDENCE RE DISCOVERY ISSUES	.2	108.00
6/28/21	BMC	REVIEW DISCOVERY LETTER FROM J. LI TO COURT REGARDING EXPERT DEPOSITIONS	3.2	1,728.00
6/28/21	BMC	REVIEW/ANALYZE SHAN, ZHAO AND KIMURA DEPOSITION TESTIMONY FOR SUMMARY JUDGMENT MOTION	4.5	2,430.00
6/28/21	BMC	DRAFT SUMMARY JUDGMENT MOTION; COMMUNICATIONS WITH HAYSTACK REGARDING DECLARATION IN SUPPORT OF MOTION; MEETING WITH A. JOHNSON REGARDING REDACTED AND UNREDACTED EXHIBITS FOR DECLARATIONS	12.2	1,830.00
6/28/21	ANJ	REVIEW AND REVISE MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION; PREPARE AND HIGHLIGHT ADDITIONAL DEPOSITION TESTIMONY AND EXHIBITS; REVISE DECLARATION OF D. WISEMAN; CONFERENCES WITH B. CARR AND D. GOLDSTEIN REGARDING CONFIDENTIAL DOCUMENTS AND FINALIZING ALL DOCUMENTS.	5.6	3,472.00
6/28/21	DWW	PREPARATION OF CORRESPONDENCE REGARDING MOTION TO DISQUALIFY TOMO KIMURA; REVIEW, REVISE AND EDIT SUMMARY ADJUDICATION PAPERS.	1.1	71.50
6/28/21	KB	PROOFREAD MOTION FOR SUMMARY ADJUDICATION.	1.5	262.50
6/28/21	KP	DOWNLOAD, STAGE, TROUBLESHOOT ISSUES AND UPLOAD OPPOSING COUNSEL QB012 TO RELATIVITY.	3.9	1,501.50
6/28/21	TN	CONSIDER SUMMARY JUDGMENT STRATEGY; WORK ON CLIENT DECLARATIONS; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; REVIEW PLAINTIFF'S CORRESPONDENCE; [REDACTED] WITH CLIENT; REVIEW COURT ORDER	4.7	1,621.50
6/28/21	DG	REVIEW PRIOR DECLARATIONS OF NOVOA AND WISEMAN TO IDENTIFY MATERIAL PREVIOUSLY FILED UNDER SEAL; APPLY CORRESPONDING REDACTIONS TO NEW DECLARATIONS IN SUPPORT OF MSA; WORK ON IDENTIFYING OTHER MATERIALS IN MSA NEEDING REDACTION; DRAFT PROPOSED ORDER IN SUPPORT OF SUMMARY ADJUDICATION.	.9	337.50
6/28/21	BE	DISCUSS STATUS AND STRATEGY REGARDING DISCOVERY ISSUES AND CORRESPONDENCE, AND SUMMARY ADJUDICATION MOTION. REVIEW MEET AND CONFER CORRESPONDENCE REGARDING DISCOVERY ISSUES. REVIEW QUINTARA'S DISCOVERY LETTER REGARDING PROTECTIVE ORDER.		
6/29/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT MOTION, DECLARATION OF D.		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 12	
Date	Tkpr	Description of Services Rendered	Hours	Amount
6/29/21	BMC	WISEMAN, DECLARATION OF R. NOVOA; DECLARATION OF WANG, LI, WONG, SHAO AND REVIEW/REVISE EXHIBITS; REVIEW/ANALYZE EXHIBITS THAT NEED TO BE REDACTED; COMMUNICATIONS WITH D. WISEMAN AND T. NG REGARDING MOTION AND REVISIONS	7.5	4,050.00
6/29/21	ANJ	REIVEW/ANALYZE DEPOSITION TESTIOMONY AND ANNOTATE TRANSCRIPTS FOR SUMMARY JUDGMENT MOTION; REVIEW/REVISE MOTION TO SEAL EXHIBITS TO SUMMARY JUDGMENT MOTION	2.1	1,134.00
6/29/21	DWW	REVIEW ALL EVIDENCE TO MOTION FOR SUMMARY ADJUDICATION/JUDGMENT WITH B. CARR; EXTENSIVE FINALIZATION OF VOLUMINOUS EXHIBITS; REVIEW EXHIBITS FOR SEALING IN PUBLIC RECORDS WITH B. CARR AND D. GOLDSTEIN; FINALIZE MEMORANDUM OF POINTS AND AUTHORITIES; PREPARE AND FINALIZE DECLARATIONS AND EXHIBITS FOR G. WANG, A. LI, A. WONG, R. SHAO AND R. NOVOA.	10.1	1,515.00
6/29/21	TN	REVIEW/REVISION OF SUMMARY ADJUDICATION PAPERS; REVIEW CITED AUTHORITY; MULTIPLE TELEPHONE CONFERENCES WITH T. NG AND B. CARR REGARDING SUMMARY ADJUDICATION PAPERS.	7.8	4,836.00
6/29/21	DG	WORK ON DECLARATIONS; REVIEW VARIOUS CORRESPONDENCE FROM PLAINTIFF, LITIGATION TEAM, AND EXPERT	1.5	577.50
6/29/21	DG	REVIEW AND REVISE CITATIONS IN THE MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION.	1.7	586.50
6/30/21	BMC	WORK ON UPDATING ADMINISTRATIVE MOTION TO SEAL TO INCLUDE NEW EXHIBITS THAT WILL BE FILED UNDER SEAL IN SUPPORT OF MSA; REVIEW EXHIBITS IN SUPPORT OF MSA FOR CONFIDENTIALITY DESIGNATIONS; REVIEW AND REVISE CITATIONS TO DECLARATIONS IN SUPPORT OF MSA; WORK ON PREPARING EXHIBITS TO MSA DECLARATIONS.	5.9	2,035.50
6/30/21	ANJ	FINALIZE SUMMARY JUDGMENT MOTION AND SUPPORTING DECLARATIONS; COMMUNICATIONS WITH HAYSTACK REGARDING FORENSIC EXAMINATION ON DEFENDANTS' COMPUTERS AND SERVER; COMMUNICATIONS WITH A. JOHNSON REGARDING PREPARATION OF REDACTED AND UNREDACTED EXHIBITS; REVIEW/REVISE EXHIBITS TO SUMMARY JUDGMENT MOTION	4.8	2,592.00
6/30/21	DWW	██████████ REQUESTED BY CLIENT; PREPARE REDACTED EXHIBITS; MULTIPLE EMAILS ASSISTING WITH FINALIZING SUMMARY ADJUDICATION DOCUMENTS FOR FILING.	5.1	765.00
6/30/21	TN	REVIEW/REVISION OF AND FINAL REVISIONS AND EDITS TO MOTION FOR SUMMARY ADJUDICATION AND SUPPORTING DECLARATIONS; TELEPHONE CALLS WITH A. LI ██████████	7.5	4,650.00
6/30/21	DG	WORK ON SUMMARY JUDGMENT MOTION AND SUPPORTING DECLARATIONS REVISE AND FINALIZE NOTICE AND MOTION TO SEAL MOTION FOR SUMMARY ADJUDICATION, WISEMAN DECLARATION IN SUPPORT OF MOTION TO SEAL, AND PROPOSED ORDER; REVIEW EXHIBITS TO WISEMAN DECLARATION IN SUPPORT OF SUMMARY ADJUDICATION.	3.8	1,463.00
			5.8	2,001.00

Date	Description of Disbursement	CheckNo	Units	Amount
5/06/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 05/06/21			6.50
5/26/21	DEPOSITION FEES APTUS COURT REPORTING DEPOSITION			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	6/30/21 1085211 Page 13
Date	Description of Disbursement	CheckNo	Units Amount
5/27/21	TRANSCRIPT OF RUI SHAO; TAKEN ON 05/06/21 - INV.# 1085633	589177	1,951.96
5/27/21	DEPOSITION FEES APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF HAILONG JIAO; TAKEN ON 05/10/21 - INV.# 1085473	589177	1,135.73
5/28/21	DEPOSITION FEES APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF GANGYOU WANG - 30(B(6) RUIFENG BIZTECH INC.; TAKEN ON 05/07/21 - INV.# 1085708	589177	1,833.34
5/28/21	DEPOSITION FEES APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF TIFFANY OWENS; TAKEN ON 05/12/21 - INV.# 1085890	589177	1,251.24
5/31/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY DEPOSITION TRANSCRIPT OF DEHUA ZHAO, PH.D.; TAKEN ON 05/13/21 - INV.# 1086432	589177	1,276.21
5/31/21	MESSENGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: XUELING ZHAO, 594 ROCK ROSE WAY, RICHMOND, CA 94806 ON 4/22/21 - SAC20201	589221	159.40
5/31/21	MESSENGER SERVICE NATIONWIDE LEGAL, LLC FROM: ALYSSA KERN, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: US FEDERAL COURT, 450 GOLDEN GATE AVE, SAN FRANCISCO, CA 94102 ON 5/12/21 - SAC20659	589221	53.20
5/31/21	MESSENGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., IRVINE TO USDC, SAN FRANCISCO ON 05/26/21 1166281	589316	41.25
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/04/21	589012	30.82
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/09/21	589012	26.16
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/10/21	589012	65.40
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/11/21	589012	15.41
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/13/21	589012	131.70
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/14/21	589012	52.32
5/31/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 05/17/21	589012	59.31
6/07/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 739615617 DATED: 6/07/21 TRACKING# 773893212713 ON 06/02/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: J. JAMES LI, LILAW INC., 1905 HAMILTON AVENUE, SUITE 20, SAN JOSE, CA 95125	588805	21.43
6/17/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 740720288 DATED: 6/17/21 TRACKING# 773995437784 ON 06/14/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: RENE NOVOA, HAYSTACKID, LLC, SIX BEACON STREET, SUITE 815, BOSTON, MA 02108	588910	31.45
6/26/21	COURT REPORTER APTUS COURT REPORTING TRANSCRIPT OF HENRY R. HU; TAKEN ON 06/08/21 - INV.# 1087033	589177	1,586.48

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 6/30/21 1085211 Page 14

Date	Description of Disbursement	CheckNo	Units	Amount
6/26/21	COURT REPORTER APTUS COURT REPORTING TRANSCRIPT OF CHARLES ZHI; TAKEN ON 06/08/21 - INV.# 1087035	589425		980.09
6/28/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 741839389 DATED: 6/28/21 TRACKING# 774079994128 ON 06/23/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL SUITE 1900, SACRAMENTO, CA 95814 TO: SENIOR DISTRICT JUDGE WILLIAM, SAN FRANCISCO COURTHOUSE, 450 GOLDEN GATE AVENUE, SAN FRANCISCO, CA 94102			12.86

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	156.4	540.00	84,456.00
ANTOINETTE N. JOHNSON	112.1	150.00	16,815.00
DYLAN WISEMAN	89.6	620.00	55,552.00
KARYN BALZARY	3.2	65.00	208.00
KEVIN PARKER	82.5	175.00	14,437.50
TIFFANY NG	88.8	385.00	34,188.00
	2.0		No Charge
DAVID GOLDSTEIN	25.6	345.00	8,832.00
BERIT ELAM	52.9	375.00	19,837.50
Total	613.1		234,326.00

Total Fees 234,326.00
Total Disbursements 10,722.26

Matter Total \$ 245,048.26

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

July 31, 2021
Invoice No. 1088014

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	454,741.76
Payments received through 08/10/21	.00
Previous Balance Remaining	454,741.76
Current Fees Through 07/31/21	158,425.50
Current Disbursements Through 07/31/21	20,858.53
Invoice Total	\$ 179,284.03
Balance Due	\$ 634,025.79

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
245,048.26	209,693.50	.00	634,025.79

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		7/31/21 1088014 Page 1
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/01/21	BMC	REVIEW ORDER REGARDING DISCOVERY DISPUTE AND EXPERTS; CHECK SUMMARY JUDGMENT FILING TO ENSURE FILED CORRECTLY; REVIEW COMMUNICATIONS FROM J. LI REGARDING CURRENT DISCOVERY DISPUTES; RESEARCH WHETHER [REDACTED]; [REDACTED]; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL STANFORD DOCUMENT PRODUCTION; REVIEW/ANALYZE KIMURA EXPERT TESTIMONY FOR FOR MOTION TO DISQUALIFY; MEET AND CONFER WITH D. PETERSON REGARDING NOVOA DOCUMENT PRODUCTION ISSUES; COMMUNICATIONS WITH R. NOVOA REGARDING NOTES/PHOTOS DISCUSSED WITH MR. BERRYHILL; REVIEW DOCKET REGARDING UPCOMING TRIAL DEADLINES	4.9	2,646.00
7/01/21	DWW	PREPARATION OF EMAIL UPDATE TO MR. WANG REGARDING [REDACTED]; [REDACTED]; EMAIL CORRESPONDENCE WITH R. NOVOA REGARDING JUDGE ALSUP'S RULING; TELEPHONE CONFERENCE WITH A. LI REGARDING [REDACTED] T; TELEPHONE CONFERENCE WITH R. NOVOA REGARDING DEPOSITION PREPARATION; CORRESPONDENCE WITH MR. WANG REGARDING [REDACTED]; CORRESPONDENCE WITH QUINTARA'S COUNSEL REGARDING REQUESTS FOR DOCUMENTS PERTAINING TO CONSTANT CONTACT LIST; REVIEW AND RESPOND TO EMAIL CORRESPONDENCE REGARDING DISQUALIFICATION OF T. KIMURA.	6.4	3,968.00
7/01/21	KP	DOWNLOAD, STAGE AND UPLOAD STANFORD PRODUCTION TO RELATIVITY.	1.3	227.50
7/01/21	TN	PREPARE FOR DISCOVERY MEET AND CONFER; PARTICIPATE IN MEET AND CONFER CALL; CONSIDER NEXT STEPS IN LITIGATION; REVIEW VARIOUS CORRESPONDENCE FROM PLAINTIFF RE DISCOVERY ISSUES	1.9	731.50
7/01/21	DG	REVIEW AND ANALYZE QUINTARA'S EMAIL OBJECTION TO THE FILING OF THE MOTION TO SEAL; DRAFT EMAIL RESPONDING TO OBJECTION.	1.3	448.50
7/01/21	BE	REVIEW MEET AND CONFER CORRESPONDENCE.	.2	75.00
7/02/21	BMC	COMMUNICATIONS WITH T. NG REGARDING HAYSTACK EXPERT PRODUCTION; COMMUNICATIONS WITH HAYSTACK REGARDING EXPERT WITNESS PRODUCTION; REVIEW/ANALYZE EXPERT FILES FOR PRODUCTION; COMMUNICATIONS WITH D. WISEMAN REGARDING REDACTION OF CUSTOMER INFORMATION FROM SUMMARY JUDGMENT MOTION; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DOCUMENT PRODUCTION; RESEARCH [REDACTED]; [REDACTED]; [REDACTED] REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL DISCOVERY RESPONSES FOR SUMMARY JUDGMENT	4.8	2,592.00
7/02/21	DWW	PREPARATION OF A. LI REGARDING [REDACTED]; [REDACTED]; REVIEW CORRESPONDENCE FROM COUNSEL FOR QUINTARA REGARDING THE CONSTANT CONTACT LIST; EMAIL TO R. NOVOA FOR THE CONSTANT CONTACT LISTING; CORRESPONDENCE WITH R. NOVOA REGARDING NOTES AND PROGRAM LOG; EMAIL CORRESPONDENCE WITH A. WONG REGARDING [REDACTED]; CORRESPONDENCE TO R. NOVOA REGARDING UPDATING NOTES; PREPARE STATUS UPDATE TO A. WONG [REDACTED]; CORRESPONDENCE WITH R. NOVOA REGARDING PHYSICAL IMAGES OF DRIVES.	5.7	3,534.00
7/02/21	TN	CONSIDER COMPUTER FORENSICS ISSUES; REVIEW VARIOUS CLIENT CORRESPONDENCE; REVIEW RENE NOVOA'S DOCUMENTS	1.9	731.50
7/04/21	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/05/21	TN	PRODUCTION OF PHYSICAL IMAGES OF WORKSTATION 2-3 AND ALAN LI COMPUTER; REVIEW CORRESPONDENCE FROM J. BERRYHILL REGARDING BITLOCKER FOR WISCONSIN DRIVE.	.4	248.00
7/06/21	BMC	REVIEW VARIOUS CORRESPONDENCE RE COMPUTER FORENSICS COMMUNICATIONS WITH T. NG REGARDING NOVOA SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW/ANALYZE DOCUMENTS FROM R. NOVOA; REVIEW DOCKET AND UPCOMING DEADLINES SET BY COURT	.6	231.00
7/06/21	DWW	REVIEW/ANALYSIS OF SUPPLEMENTAL EXPERT REPORT; CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING EXCHANGE; EMAIL CORRESPONDENCE AND TELEPHONE CONFERENCE WITH T. NG REGARDING QUINTARA'S POST-MARCH 2020 REACTION REPORTS ADDED TO THE 929 FILES.	.6	324.00
7/06/21	TN	HANDLE DOCUMENT PRODUCTION; IDENTIFY ADDITIONAL EVIDENCE TO INCLUDE IN HAYSTACK'S EXPERT REPORT	2.3	1,426.00
7/06/21	EE	PROCESS DOCUMENTS AND DELIVER PRODUCTION VOLUME RUIFENG015.	2.0	770.00
7/07/21	BMC	COMMUNICATIONS WITH R. NOVOA REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION; REVIEW/ANALYZE DECLARATION OF D. PETERSON IN SUPPORT OF MOTION TO SEAL SUMMARY JUDGMENT DOCUMENTS; REVIEW/ANALYZE SUE ZHAO DEPOSITION; REVIEW/ANALYZE QUN SHAN DEPOSITION REGARDING CUSTOMER DATABASE; RESEARCH REGARDING [REDACTED]	2.5	462.50
7/07/21	DWW	[REDACTED]	3.8	2,052.00
7/07/21	DWW	READ EMAIL FROM NG, TIFFANY F.: RE: RUIFENG [IWOV-BN.FID3231313] READ EMAIL FROM NG, TIFFANY F.: RE: RUIFENG [IWOV-BN.FID3231313] COMPOSED EMAIL TO ASMITH@BUCHALTER.COM, NG, TIFFANY F., CARR, BRANDON M.: RE: RUIFENG [IWOV-BN.FID3231313] READ EMAIL FROM NG, TIFFANY F.: RE: BUCH5267_SUPPLEMENTAL REPORTV9EDITS.DOCX	.1	62.00
7/07/21	KP	TELECONFERENCE W N. YAVIN AND E. EPPRIGHT RE CLIENT PRODUCTION REQUESTED BY T. NG; EMAIL CORRESPONDENCE WITH T. NG; PROCESS AND UPLOAD HAYSTACK ICLOUD IMAGES TO RELATIVITY FOR PRODUCTION; PREPARE, PRODUCE AND FINALIZE RUIFENG-HAYSTACK-002 PRODUCTION AND UPLOAD TO SHAREFILE FOR TRANSFER; DOWNLOAD, PROCESS AND UPLOAD BERRYHILL FILE LISITNGS BATCH 2 TO RELATIVITY.	5.2	910.00
7/07/21	TN	FINALIZE EXPERT DOCUMENT PRODUCTION; EVALUATE AUTHORITIES RE EXPERT DISQUALIFICATION	1.6	616.00
7/07/21	DG	REVIEW QUINTARA'S DECLARATION SUPPORTING SEALING AND CORRESPONDING LOCAL RULES.	.5	172.50
7/08/21	BMC	REVIEW/ANALYZE BERRYHILL SUPPLEMENTAL EXPERT REPORT; REVIEW/ANALYZE NOVOA SUPPLEMENTAL EXPERT REPORT; COMMUNICATIONS WITH D. WISEMAN REGARDING SUPPLEMENTAL REPORTS; RESEARCH REGARDING [REDACTED]	4.5	2,430.00
7/08/21	DWW	CORRESPONDENCE WITH WITH G. WANG REGARDING [REDACTED]; EMAIL MESSAGE TO COUNSEL FOR QUINTARA REGARDING BERRYHILL AND NOVOA MEETING; REVIEW AND RESPOND TO EMAIL MESSAGES FROM COUNSEL FOR QUINTARA SEEKING TO LIMIT SCOPE OF NOVOA REPORT; REVIEW AND EDIT NOVOA DEPOSITION NOTICE; TELEPHONE CONFERENCE WITH R. NOVOA REGARDING		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/08/21	TN	DEPOSITION PREPARATION; REVIEW VARIOUS CORRESPONDENCE FROM CLIENT AND PLAINTIFF; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; WORK ON MOTION TO EXCLUDE TOMO KIMURA'S TESTIMONY	4.2	2,604.00
7/09/21	BMC	COMMUNICATIONS WITH B. ELAM REGARDING SUMMARY JUDGMENT RESEARCH FOR [REDACTED] [REDACTED] REVIEW/ANALYZE BERRYHILL SUPPLEMENTAL REPORT; RESEARCH [REDACTED] [REDACTED]; REVIEW AMENDED DEPOSITION NOTICE TO R. NOVOA; RESEARCH [REDACTED] [REDACTED]; COMMUNICATIONS WITH D. PETERSON REGARDING NON-COMPLIANCE WITH JUDGE TSE'S DISCOVERY ORDER TO AMEND DISCOVERY RESPONSES	4.3	1,655.50
7/09/21	DWW	REVIEW/ANALYSIS OF SUPPLEMENTAL EXPERT REPORT OF J. BERRYHILL; PREPARE STATUS UPDATE TO G. WANG REGARDING [REDACTED]; EXTENDED TELEPHONE CONFERENCE WITH G. WANG, EMAIL MESSAGES TO T. NG REGARDING NATIVE QUICKBOOKS FILES; EMAIL CORRESPONDENCE TO COUNSEL FOR QUINTARA REGARDING T. KIMURA BEING PROHIBITED FROM REVIEWING ATTORNEYS' EYES ONLY RECORDS.	3.6	1,944.00
7/09/21	KP	MANUALLY PULL QB BATES NUMBERS OFF LOG PROVIDED BY T. NG, QUERY IN RELATIVITY, EXPORT AND SEND TO T. NG; COMPRESS AND EMAIL QB012 PRODUCTION TO T. NG; EMAIL CORRESPONDENCE WITH T. NG.	4.7	2,914.00
7/09/21	TN	REVIEW LITIGATION TEAM CORRESPONDENCE; [REDACTED] WITH CLIENT; WRITE TO PLAINTIFF RE TOMO KIMURA DEFICIENT DOCUMENT PRODUCTION	1.8	315.00
7/10/21	TN	CONTINUE TO WRITE MOTION TO EXCLUDE	2.0	770.00
7/12/21	BMC	REVIEW/ANALYZE BERRYHILL SUPPLEMENTAL REPORT; CONFERENCE WITH R. NOVOA REGARDING BERRYHILL REPORT AND DECLARATION FOR REPLY TO SUMMARY JUDGMENT; DRAFT REPLY SUMMARY JUDGMENT OUTLINE; REVIEW/ANALYZE QUINTARA'S SUPPLEMENTAL SPECIAL INTERROGATORIES DISCOVERY RESPONSES; MEETING WITH D. WISEMAN REGARDING SUMMARY JUDGMENT AND EXPERT DEPOSITIONS	3.8	1,463.00
7/12/21	BMC	CONFERENCE WITH A. LI REGARDING [REDACTED], [REDACTED] [REDACTED]	5.8	3,132.00
7/12/21	DWW	FOR EXPERT DEPOSITIONS; REVIEW BERRYHILL REPORT.	1.4	756.00
7/12/21	TN	[REDACTED] WITH CLIENT	4.8	2,976.00
7/12/21	BE	CONDUCT RESEARCH FOR [REDACTED] [REDACTED]	.5	192.50
7/13/21	BMC	REVIEW/ANALYZE MOTION TO DISQUALIFY T. KIMURA; COMMUNICATIONS WITH D. WISEMAN REGARDING PROPOSED REVISIONS TO MOTION	1.9	712.50
7/13/21	BMC	DRAFT DECLARATION OF A. LI IN SUPPORT OF REPLY TO SUMMARY JUDGMENT; REVIEW/ANALYZE EXHIBITS REFERENCED IN BERRYHILL SUPPLEMENTAL REPORT; CONFERENCE WITH A. LI REGARDING [REDACTED] [REDACTED] CONFERENCE WITH D. WISEMAN REGARDING EXPERT DEPOSITIONS AND REPLY TO SUMMARY JUDGMENT	.7	378.00
7/13/21	DWW	REVIEW/ANALYSIS OF MOTION FOR SUMMARY ADJUDICATION; REVIEW AND	6.5	3,510.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 4	
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/13/21	KP	ANALYZE BERRYHILL REPORT; PREPARE FOR BERRYHILL DEPOSITION.	8.2	5,084.00
7/13/21	TN	UPLOAD TRF104996 20210517 CLARK, CORENA, TRF106728 20210608 HU, HENRY R, TRF106764 20210608 ZHI, CHARLES, TRF106766 20210608 ZHI, CHARLES AND TRF107045 20210608 HU, HENRY R TO CASENOTEBOOK.	2.3	402.50
7/13/21	BE	WORK ON ADMIN MOTION TO SEAL; WORK IN DECLARATIONS IN SUPPORT OF MOTION TO DISQUALIFY; PARTICIPATE IN CLIENT CONFERENCE CALL TO [REDACTED]	3.6	1,386.00
7/13/21	BMC	REVIEW AND DISCUSS PRIVILEGE ISSUE. CONDUCT RESEARCH FOR [REDACTED]	3.7	1,387.50
7/14/21	DWW	REVIEW/ANALYZE RESEARCH [REDACTED]	4.9	2,646.00
7/14/21	KP	[REDACTED] DRAFT REPLY TO SUMMARY JUDGMENT ADDRESSING BERRYHILL EXPERT REPORT; CONFERENCE WITH A. LI REGARDING [REDACTED] CONFERENCE WITH A. WONG [REDACTED]	8.4	5,208.00
7/14/21	TN	PREPARATION OF AND TAKE DEPOSITION OF BERRYHILL; PREPARE R. NOVOA FOR DEPOSITION ON JULY 15, 2021.	1.4	245.00
7/14/21	BE	QUERY QUINTARA PRODUCED DOCUMENTS FOR COVID AND PROVIDE RELATIVITY REVIEW SEARCH AND EXPORT AND SEND TO D. WISEMAN; CREATE USER CREDENTIALS AND ADD B. ELAM TO THE RELATIVITY WORKSPACE.	3.9	1,501.50
7/14/21	BMC	WORK ON MOTION TO EXCLUDE AND DISQUALIFY TOMO KIMURA	1.0	375.00
7/15/21	BMC	SEARCH FOR KEY KIMURA CORRESPONDENCE BASED ON BERRYHILL REPORT.	3.8	2,052.00
7/15/21	DWW	REVIEW/ANALYZE QUINTARA'S OPPOSITION TO SUMMARY JUDGMENT AND SUPPORTING DECLARATIONS AND EVIDENCE	4.5	2,430.00
7/15/21	KP	DRAFT REPLY BRIEF TO SUMMARY JUDGMENT MOTION	7.8	4,836.00
7/15/21	DG	ATTENDANCE AT AND DEFEND NOVOA DEPOSITION; PREPARE, REVISE AND EDIT NOVOA DECLARATION; REVISE AND EDIT REPLY BRIEF; REVIEW OPPOSITION TO SUMMARY ASHY ACTION MOTION; PREPARE FOR HEARING ON MOTION FOR TERMINATING SANCTIONS; REVISE AND EDIT REPLY BRIEF TO MOTION FOR SUMMARY ADJUDICATION; REVIEW QUINTARA'S OPPOSITION BRIEF.	2.7	472.50
7/15/21	BE	STAGE, PROCESS AND UPLOAD HAYSTACK PROJECT SUMMARY TO RELATIVITY; PREPARE AND PRODUCE RUIFENG016, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL CORRESPONDENCE WITH D. WISEMAN.	2.5	862.50
7/16/21	BMC	REVIEW QUINTARA'S MOTION TO SEAL AND ANALYZE THE DOCUMENTS IT RELIED UPON IN SUPPORT OF ITS OPPOSITION TO MSA TO DETERMINE WHICH DOCUMENTS DEFENDANTS SHOULD SUPPORT SEALING; DRAFT RECOMMENDATIONS TO D. WISEMAN.	.1	37.50
7/16/21	BMC	DISCUSS REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT.	6.8	3,672.00
7/16/21	DWW	DRAFT REPLY IN SUPPORT OF SUMMARY JUDGMENT MOTION	1.7	918.00
7/16/21	DWW	RESEARCH [REDACTED] [REDACTED]; RESEARCH [REDACTED] [REDACTED]	7.8	4,836.00
7/16/21	DWW	REVIEW OPPOSITION TO SUMMARY ADJUDICATION; PREPARE, REVISE AND EDIT NOVOA DECLARATION; REVISE AND EDIT REPLY BRIEF; PREPARE FOR HEARING ON MOTION FOR TERMINATING SANCTIONS.		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 5	
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/16/21	KP	QUERY IMG_0672 DOC FOR DEPOSITION PER T. NG AND SEND VIA EMAIL: EMAIL CORRESPONDENCE WITH T. NG.	.4	70.00
7/16/21	TN	RESPOND TO CLIENT INQUIRIES RE EXPERT DEPOSITION	.2	77.00
7/16/21	DG	PREPARE DECLARATION IN SUPPORT OF SEALING EXHIBIT JB-18 TO PLAINTIFF'S OPPOSITION.	1.0	345.00
7/16/21	DG	LEGAL RESEARCH IN [REDACTED];		
		DRAFT EMAIL MEMORANDUM.	1.4	483.00
7/16/21	DG	LEGAL RESEARCH IN [REDACTED]; DRAFT INSERT		
		FOR REPLY.	1.4	483.00
7/16/21	DG	LEGAL RESEARCH IN [REDACTED];		
		[REDACTED] DRAFT INSERT FOR REPLY.	3.2	1,104.00
7/17/21	BMC	DRAFT REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT	5.4	2,916.00
7/18/21	BMC	DRAFT REPLY TO SUMMARY JUDGMENT; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME	4.7	2,538.00
7/18/21	TN	REVIEW VARIOUS LITIGATION STRATEGY CORRESPONDENCE; REVIEW PLAINTIFF'S OPPOSITION TO SUMMARY JUDGMENT MOTION; REVIEW DRAFT REPLY TO SUMMARY JUDGMENT MOTION	1.4	539.00
7/19/21	BMC	DRAFT/REVISE SUMMARY JUDGMENT REPLY; DRAFT/REVISE DECLARATION OF ALAN LI IN SUPPORT OF REPLY; CONFERENCE WITH R. NOVOA REGARDING FORENSIC WORK; DRAFT/REVISE DECLARATION OF D. WISEMAN IN SUPPORT OF REPLY; CONFER WITH D. GOLDSTEIN REGARDING OBJECTIONS TO QUINTARA'S MOTION TO SEAL DOCUMENTS	7.5	4,050.00
7/19/21	DWW	PREPARATION FOR HEARING ON JULY 20, 2021 AND REVIEW AND EDIT NOVOA REPLY DECLARATION AND REPLY BRIEF.	7.8	4,836.00
7/19/21	KP	DOWNLOAD, EXTRACT, SYNCHRONIZE AND UPLOAD 20210413 ZHAO, XUELING TO CASENOTEBOOK;	1.4	245.00
7/19/21	TN	WORK ON EVIDENTIARY OBJECTIONS; PREPARE FOR MOTION FOR TERMINATING SANCTIONS HEARING; REVIEW DRAFT REPLY IN SUPPORT OF SUMMARY ADJUDICATION MOTION	3.0	1,155.00
7/19/21	DG	REVISE DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION TO SEAL; REVIEW REPLY EVIDENTIARY REFERENCES TO DETERMINE IF SEALING IS REQUIRED; REVISE LEGAL CITATIONS IN REPLY; BEGIN CHECKING AND FILLING IN CITATIONS TO EVIDENCE IN REPLY.	4.5	1,552.50
7/19/21	BE	RESEARCH [REDACTED];		
		[REDACTED]		
		[REDACTED]	3.3	1,237.50
7/20/21	BMC	DRAFT/REVISE REPLY TO SUMMARY JUDGMENT AND DECLARATIONS IN SUPPORT OF REPLY; COMMUNICATIONS WITH A. LI REGARDING REPLY DECLARATION; ANALYZE DOCUMENTS THAT NEED TO BE SEALED FOR SEALING MOTION	7.5	4,050.00
7/20/21	BMC	ATTEND HEARING ON MOTION FOR TERMINATING SANCTIONS	1.5	810.00
7/20/21	DWW	REVIEW/REVISION OF REPLY BRIEF ON SUMMARY ADJUDICATION; REVISE AND EDIT NOVOA DECLARATION, WANG DECLARATION, AND LI DECLARATION; PREPARE FOR AND ARGUE AT HEARING ON MOTION FOR TERMINATING SANCTIONS.	9.4	5,828.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 6	
Date	Tkpr	Description of Services Rendered	Hours	Amount
7/20/21	KP	DOWNLOAD KIMURA, TOMO VIDEO DEPOSITIONS AND UPLOAD/OVERLAY TO CASENOTEBOOK.	3.0	525.00
7/20/21	TN	PREPARE FOR AND ATTEND HEARING ON MOTION FOR TERMINATING SANCTIONS; REVISE ALAN LI DECLARATION; IDENTIFY ADDITIONAL DOCUMENT TO USE IN SUPPORT OF SUMMARY ADJUDICATION; WORK ON REPLY TO SUMMARY JUDGMENT	5.9	2,271.50
7/20/21	DG	REVIEW DECLARATION OF PETERSON IN SUPPORT OF ADMINISTRATIVE MOTION TO SEAL PORTIONS OF KIMURA MOTION TO DETERMINE IF FURTHER ACTION IS REQUIRED.	.3	103.50
7/20/21	DG	REVIEW NOVOA REPLY DECLARATION AND REPLY MPA TO CONFIRM THAT ALL RELEVANT ASSERTIONS IN BRIEF ARE PROPERLY DISCUSSED IN DECLARATION; WORK ON WISEMAN DECLARATION AND PREPARING EXHIBITS.	4.4	1,518.00
7/20/21	DG	REVISING AND CROSS-REFERENCING CITATIONS TO ALL CLIENT DECLARATIONS AND EXHIBITS IN SUPPORT OF THE REPLY BRIEF; REVISIONS TO REPLY BRIEF.	4.8	1,656.00
7/20/21	BE	DISCUSS AND RESEARCH [REDACTED]	2.4	900.00
7/21/21	BMC	DRAFT/REVISE REPLY TO SUMMARY JUDGMENT, MOTION TO SEAL, DECLARATIONS IN SUPPORT OF SUMMARY JUDGMENT; COMMUNICATIONS WITH D. WISEMAN AND T. NG REGARDING REVISIONS TO DOCUMENTS; COMMUNICATIONS WITH A. LI REGARDING [REDACTED] [REDACTED] REVIEW/ANALYZE RESEARCH ON [REDACTED] [REDACTED]; REVIEW/ANALYZE PLAINTIFF'S SECOND AMENDED DISCLOSURES; DRAFT/REVISE MOTION TO SEAL REPLY DOCUMENTS	7.5	4,050.00
7/21/21	DWW	REVIEW/REVISION OF REPLY BRIEF TO SUMMARY ADJUDICATION MOTION; FINAL REVISIONS AND EDITS TO WISEMAN DECLARATION, LI DECLARATION, AND WANG DECLARATAION; REVIEW AND EDIT MOTION TO SEAL.	7.7	4,774.00
7/21/21	KB	PROOFREAD DEFENDANT'S REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION.	.8	52.00
7/21/21	TN	WORK ON SUMMARY JUDGMENT REPLY AND DECLARATIONS; [REDACTED] [REDACTED] WITH THE CLIENT	3.2	1,232.00
7/21/21	DG	FINALIZE WANG DECLARATION AND REFERENCES TO IT IN THE REPLY BRIEF; PREPARE ADMINISTRATIVE MOTION TO SEAL PORTIONS OF REPLY; WORK ON LEGAL CITATIONS IN REPLY BRIEF; FINAL REVIEW AND REVISIONS TO REPLY BRIEF.	5.8	2,001.00
7/21/21	BE	CONDUCT RESEARCH FOR [REDACTED] [REDACTED]	2.2	825.00
7/22/21	BMC	REVIEW LOCAL RULES REGARDING EXPERT DISCOVERY MOTIONS; COMMUNICATIONS WITH D. WISEMAN REGARDING RULES; REVIEW SUMMARY JUDGMENT REPLY FILING TO ENSURE FILED CORRECTLY; REVIEW/ANALYZE PROCESSED ORDERS SPREADSHEET AND CUSTOMER LIST DOCUMENT FOR HEARING ON SUMMARY JUDGMENT MOTION AND EVIDENCE CREATED AFTER DATE OF MISAPPROPRIATION	1.9	1,026.00
7/22/21	KP	QUERY QB NATIVE DOCUMENTS IN RELATIVITY, EXPORT AND SEND TO T. NG; DOWNLOAD AND OVERLAY CHEN YI QUIN, A. WONG, G. WANG , A. LI VIDEO DEPOSITIONS INTO CASENOTEBOOK.	1.6	280.00
7/23/21	DWW	REVIEW/ANALYSIS OF REPLY PAPERS REGARDING MOTION FOR SUMMARY		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 7/31/21 1088014 7 Page

Date	Tkpr	Description of Services Rendered	Hours	Amount
7/23/21	KP	ADJUDICATION. DOWNLOAD 20210625 A. LI AND A. WONG DEPOSITIONS, SYNCHRONIZE AND UPLOAD TO CASENOTEBOOK.	2.5	1,550.00
7/23/21	TN	[REDACTED] WITH CLIENT	2.0	350.00
7/26/21	BMC	REVIEW/ANALYZE ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL FILED BY QUINTARA; REVIEW/ANALYZE DOCKET REGARDING UPCOMING DEADLINES; REVIEW/ANALYZE PRE-TRIAL ORDER REGARDING REQUIRED FILINGS; COMMUNICATIONS WITH D. WISEMAN REGARDING PRE-TRIAL DEADLINES	.2	77.00
7/26/21	DWW	PREPARATION FOR HEARING ON SUMMARY ADJUDICATION HEARING.	1.5	810.00
7/27/21	BMC	REVIEW OBJECTIONS TO DEFENDANTS' EVIDENCIARY OBJECTIONS	2.4	1,488.00
7/27/21	DWW	PREPARATION FOR HEARING ON SUMMARY ADJUDICATION MOTION.	.2	108.00
7/27/21	KP	DOWNLOAD J. BERRYHILL, G. WANG AND Y. CHEN DEPOSITIONS, SYNCHRONIZE AND UPLOAD TO CASENOTEBOOK.	1.4	868.00
7/27/21	DG	REVIEW QUINTARA'S OBJECTION TO THE REPLY OBJECTIONS TO EVIDENCE; EMAIL RE SAME.	2.1	367.50
7/28/21	BMC	REVIEW/ANALYZE OPPOSITION TO MOTION TO DISQUALIFY T. KIMURA	.5	172.50
7/28/21	DWW	PREPARATION FOR HEARING ON SUMMARY ADJUDICATION MOTION AND PREPARE OUTLINE REGARDING SAME.	.7	378.00
7/28/21	TN	SPEAK WITH CLIENT RE [REDACTED]; REVIEW PLAINTIFF'S OPPOSITION TO DISQUALIFICATION MOTION	5.7	3,534.00
7/29/21	DWW	PREPARATION FOR HEARING ON SUMMARY ADJUDICATION; PREPARE OUTLINE AND DEMONSTRATIVES.	.8	308.00
7/30/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING SUMMARY JUDGMENT HEARING AND DEMONSTRATIVES FOR HEARING; PREPARE DEMONSTRATIVES FOR HEARING	6.2	3,844.00
7/30/21	DWW	TELEPHONE CONFERENCE WITH G. WANG, A. LI AND T. NG REGARDING [REDACTED].	1.1	594.00
7/30/21	KP	EMAIL CORRESPONDENCE WITH T. NG AND D. WISEMAN; QUERY, EXPORT AND TRANSFER NATIVE QB DOCUMENTS TO D. WISEMAN; DOWNLOAD AND EXTRACT TRG117455 SHAO, RUI 20210624 & TRG119617 BERRYHILL, JON 20210715 VIDEO DEPOSITIONS AND UPLOAD TO CASENOTEBOOK.	5.4	3,348.00
7/30/21	TN	PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT	2.6	455.00
			.8	308.00

Date	Description of Disbursement	CheckNo	Units	Amount
6/25/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 06/25/21			5.70
6/28/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 06/28/21			5.10
6/29/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 06/29/21			5.10
6/30/21	COURT REPORTER APTUS COURT REPORTING CERTIFIED DEPOSITION TRANSCRIPT OF TOMO KIMURA; TAKEN ON 06/22/21 - INV.# 1087535	589786		7,045.13
6/30/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF JON BERRYHILL (NON-APPEARANCE); TAKEN ON			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	7/31/21 1088014 8
Date	Description of Disbursement	CheckNo	Units Amount
6/30/21	06/29/21 - INV.# 1087800 COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT - GANGYOU WANG, VOL. III; TAKEN ON 06/24/21 - INV# 1087796	589786	495.00
6/30/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF YI QING CHEN, VOL. II; TAKEN ON 06/24/21 - INV.# 1087798	589786	834.21
6/30/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF MARYELLEN SEBOLD; TAKEN ON 06/23/21 - INV.# 1088561	589786	619.08
6/30/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY OF ALEX WONG TRANSCRIPT, VOL. 2; TAKEN ON 06/25/21 - INV.# 1088186	589786	706.22
6/30/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY OF ALAN LI TRANSCRIPT, VOL. 2; TAKEN ON 06/25/21 - INV.# 1088192	589786	662.80
6/30/21	DEPOSITION FEES APTUS COURT REPORTING CERTIFIED COPY OF TRANSCRIPT FOR RUI SHAO; TAKEN ON 06/24/21 - INV.# 1087794	589786	856.40
6/30/21	MESSANGER SERVICE NATIONWIDE LEGAL, LLC FROM: AMY SMITH, BUCHALTER 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: U.S. DISTRICT CT, NORTHERN DIST OF CA, 450 GOLDEN GATE, S.F., CA 94102 ON 6/2/21 - SAC21136	589754	812.65
6/30/21	MESSANGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN FRANCISCO ON 06/28/21 1606532	589754	230.20
6/30/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 06/18/21	589846	151.75
7/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY GOLDSTEIN,DAVID ON 06/17/21	589466	36.90
7/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 06/11/21	589347	20.29
7/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 06/14/21	589347	26.95
7/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 06/25/21	589347	107.80
7/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 06/28/21	589347	40.42
7/15/21	MESSANGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN FRANCISCO ON 07/15/21 1606654	589347	38.39
7/15/21	MESSANGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN FRANCISCO ON 07/01/21 1606559	590102	87.75
7/20/21	DEPOSITION FEES APTUS COURT REPORTING EXPEDITED TRANSCRIPT FOR JON BERRYHILL; TAKEN ON 07/15/21 - INV.# 1088536	590102	383.55
7/22/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF RENE NOVOA; TAKEN ON 07/16/21 - INV.# 1088614	589786	3,299.11
7/22/21	DEPOSITION FEES BERRYHILL COMPUTER FORENSICS, INC DEPOSITION FEES (DEPOSITION TAKEN ON JULY 16, 2021)	590395	2,102.93
7/27/21	COURT REPORTER ANA M. DUB.CSR# 7445 U.S. DISTRICT COURT	589567	2,250.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 7/31/21 1088014 9 Page

Date	Description of Disbursement	CheckNo	Units	Amount
	COPY OF HEARING TRANSCRIPT	589597		35.10

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	97.8	540.00	52,812.00
DYLAN WISEMAN	109.3	620.00	67,766.00
KARYN BALZARY	.8	65.00	52.00
KEVIN PARKER	27.8	175.00	4,865.00
TIFFANY NG	41.6	385.00	16,016.00
DAVID GOLDSTEIN	31.6	345.00	10,902.00
ED EPPRIGHT	2.5	185.00	462.50
BERIT ELAM	14.8	375.00	5,550.00
Total	326.2		158,425.50

Total Fees	158,425.50
Total Disbursements	20,858.53

Matter Total	\$ 179,284.03
---------------------	----------------------

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

August 31, 2021
Invoice No. 1091192

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	634,025.79
Payments received through 09/03/21	.00
Previous Balance Remaining	634,025.79
Current Fees Through 08/31/21	196,369.00
Current Disbursements Through 08/31/21	5,449.09
Invoice Total	\$ 201,818.09
Balance Due	\$ 835,843.88

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
179,284.03	245,048.26	209,693.50	835,843.88

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	8/31/21 1091192 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/01/21	TN	REVIEW PLAINTIFF'S OPPOSITION TO MOTION TO DISQUALIFY; WRITE REPLY IN SUPPORT OF MOTION TO DISQUALIFY	4.0	1,540.00
8/02/21	BMC	DRAFT/REVISE DEMONSTRATIVES FOR SUMMARY JUDGMENT HEARING; REVIEW/ANALYZE QUINTARA'S OPPOSITION FOR SUMMARY JUDGMENT HEARING AND COMPILE/PREPARE KEY EVIDENCE FOR SUMMARY JUDGMENT HEARING; COMMUNICATIONS WITH D. WISEMAN REGARDING REPLY TO MOTION TO DISQUALIFY T. KIMURA; REVIEW/ANALYZE BERRYHILL SUPPLEMENTAL REPORT AND EXHIBITS REGARDING ALLEGED USE OF TRADE SECRETS	5.3	2,862.00
8/02/21	DWW	REVIEW/REVISION OF REPLY TO MOTION TO DISQUALIFY EXPERT; PREPARE FOR HEARING ON SUMMARY ADJUDICATION MOTION.	5.3	3,286.00
8/02/21	KP	DOWNLOAD AND EXTRACT HAYSTACK COLLECTED "ALEX WONG ANDROID PHONE, SECOND PHONE" DATA.	1.3	227.50
8/02/21	TN	REVIEW AND RESPOND TO CLIENT [REDACTED] AUTHORITIES RE REASONABLE ROYALTY UNDER THE DTSA	.8	308.00
8/03/21	BMC	PREPARATION FOR SUMMARY JUDGMENT HEARING; DRAFT/REVISE DEMONSTRATIVES; REVIEW/COMPILE EVIDENCE TO BRING TO HEARING	4.6	2,484.00
8/03/21	DWW	REVIEW/REVISION OF REVISE AND EDIT REPLY TO MOTION TO DISQUALIFY T. KIMURA AS NON-RETAINED EXPERT; PREPARE FOR HEARING ON SUMMARY ADJUDICATION MOTION.	5.2	3,224.00
8/03/21	KB	PROOFREAD DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO EXCLUDE AND DISQUALIFY EXPERT TESTIMONY OF TOMO KIMURA AND TO EXCLUDE ANY EVIDENCE OR TESTIMONY RE PUNITIVE DAMAGES, ATTORNEY'S FEES AND COSTS.	.6	39.00
8/03/21	KP	DOWNLOAD MARYELLEN SEBOLD 10084199 & RENE NOVOA 10085531 VIDEO DEPOSITIONS, EXTRACT AND UPLOAD TO CASENOTEBOOK.	1.4	245.00
8/03/21	TN	CORRESPOND WITH CLIENT RE [REDACTED]	.4	154.00
8/04/21	BMC	PREPARATION FOR SUMMARY JUDGMENT HEARING WITH D. WISEMAN; COMPILE EVIDENCE FOR HEARING AND DEMONSTRATIVES; COMMUNICATIONS WITH J. LI REGARDING DEMONSTRATIVES FOR SUMMARY JUDGMENT HEARING	5.2	2,808.00
8/04/21	ANJ	DRAFT AND FINALIZE INDEX OF J. BERRYHILL EXPERT REPORT EXHIBITS IN PREPARATION FOR COURT HEARING; ANNOTATE BOXES FOR COURTROOM PRESENTATION.	2.9	435.00
8/04/21	DWW	PREPARATION FOR HEARING ON MOTION FOR SUMMARY ADJUDICATION.	8.9	5,518.00
8/04/21	KP	EMAIL CORRESPONDENCE WITH B. CARR; UPDATE RELATIVITY REVIEW LAYOUT PER B. CARR; CREATE QUINTARA AND RUIFENG PRODUCTION RELATIVITY SEARCHES FOR B. CARR; PROVIDE RELATIVITY SEARCH AND REVIEW TRAINING TO B. CARR.	1.3	227.50
8/04/21	TN	WORK ON ERRATA SHEET; REVIEW COURT ORDERS; REVIEW PLAINTIFF'S SUPPLEMENTAL DECLARATION	.5	192.50
8/05/21	J S	ASSIST MR. WISEMAN AND MR. CARR WITH DOCUMENTS AT SUMMARY JUDGMENT HEARING	2.9	623.50
8/05/21	BMC	ATTEND SUMMARY JUDGMENT MEETING; COMMUNICATIONS WITH D. GOLDSTEIN REGARDING USE OF TRADE SECRET DOCUMENTS AFTER PARTNERSHIP; REVIEW/ANALYZE CASE LAW REGARDING SAME; REVIEW ORDERS FROM COURT REGARDING SETTLEMENT CONFERENCE	5.5	2,970.00
8/05/21	DWW	PREPARATION FOR AND ARGUE AT HEARING ON SUMMARY ADJUDICATION		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/21 1091192 2
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/05/21	TN	MOTION IN NORTHERN DISTRICT; MEETINGS WITH G. WANG, M. LIAN, AND B. CARR [REDACTED]	7.2	4,464.00
8/05/21	DG	REVIEW VARIOUS COURT ORDERS	.4	154.00
		CASE LAW RESEARCH TO [REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
8/06/21	BMC	RESEARCH REGARDING [REDACTED]	5.5	1,897.50
		[REDACTED]		
8/06/21	DWW	REVIEW/ANALYSIS OF COMPLAINT AGAINST DEFENDANTS FILED BY QUINTARA IN THE SANTA CLARA SUPERIOR COURT; PREPARE EMAIL TO T. NG AND B. CARR REGARDING MAINTAINING TWO ACTIONS.	3.2	1,728.00
8/06/21	TN	REVIEW CLIENT CORRESPONDENCE; REVIEW STATE COURT COMPLAINT; RESEARCH [REDACTED]	1.5	930.00
		[REDACTED]		
8/06/21	DG	CONTINUE CASE LAW RESEARCH TO [REDACTED]	1.0	385.00
		[REDACTED]		
		[REDACTED]; DRAFT EMAIL MEMO TO B. CARR.		
8/09/21	BMC	REVIEW RESEARCH MEMO FROM D. GOLDSTEIN REGARDING [REDACTED]	4.5	1,552.50
		[REDACTED]		
		[REDACTED]; REVIEW/ANALYZE SUPERIOR COURT COMPLAINT; COMMUNICATIONS WITH D. GOLDSTEIN REGARDING VENUE AND PROPRIETY OF FILING STATE COURT ACTION WHEN FEDERAL CASE PENDING		
8/09/21	DWW	PREPARATION OF PRE-TRIAL ASSIGNMENTS AND PROJECTS; PREPARE FOR AND PARTICIPATE IN TELEPHONE CONFERENCE WITH MAGISTRATE JUDGE HIXSON REGARDING SETTLEMENT CONFERENCE; REVIEW AND EDIT SANTA CLARA SUPERIOR COURT CASE; PREPARE, REVISE AND EDIT NOTICE OF RELATED CASE.	3.6	1,944.00
8/09/21	FV	LOCATE AND OBTAIN SUMMONS FILED IN SANTA CLARA SUPERIOR COURT CASE # 21CV385112 FOR D WISEMAN.	4.8	2,976.00
8/09/21	TN	REVIEW CLIENT'S [REDACTED]; DISCUSS [REDACTED] WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION IN LIGHT OF STATE COURT LAWSUIT	.1	9.50
8/09/21	DG	CASE LAW RESEARCH REGARDING [REDACTED]	1.0	385.00
		[REDACTED]; DRAFT EMAIL MEMORANDUM REGARDING SAME.		
8/10/21	BMC	REVIEW/ANALYZE PRE-TRIAL DEADLINES; COMMUNICATIONS WITH D. GOLDSTEIN REGARDING NEW COMPLAINT FILED IN STATE COURT; CONFERENCE WITH D. WISEMAN AN T. NG REGARDING REGARDING PRE-TRIAL DEADLINES AND FILINGS; REVIEW SETTLEMENT CONFERENCE JUDGE RULES AND LOCAL RULES REGARDING MEDIATION STATEMENT; REVIEW SETTLEMENT CONFERENCE ORDER; DRAFT MEDIATION STATEMENT	5.6	1,932.00
8/10/21	DWW	PREPARATION OF NOTICE OF RELATED CASE AND WISEMAN DECLARATION; PREPARE EMAIL TO LITIGATION TEAM REGARDING RESPONSIBILITIES; PREPARE EMAIL TO MAGISTRATE JUDGE HIXSON'S CLERK REGARDING SETTLEMENT CONFERENCE; REVIEW MAGISTRATE JUDGE HIXSON'S STANDING ORDER.	4.9	2,646.00
			5.3	3,286.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/21 1091192 3
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/10/21	TN	PARTICIPATE IN STRATEGY CALL; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; REVIEW SETTLEMENT COURT ORDER	1.4	539.00
8/10/21	DG	LEGAL RESEARCH REGARDING [REDACTED]	5.7	1,966.50
8/10/21	BE	DISCUSS STRATEGY AND TRIAL PREPARATIONS.	.6	225.00
8/11/21	BMC	DRAFT/REVISE SETTLEMENT CONFERENCE STATEMENT; REVIEW EVIDENCE CITED BY QUINTARA AT SUMMARY JUDGMENT HEARING; REVIEW CLIENT EMAILS REGARDING [REDACTED]; REVIEW SUMMARY JUDGMENT ORDER AND ORDER ON TERMINATING SANCTIONS	5.7	3,078.00
8/11/21	TN	REVIEW CLIENT CORRESPONDENCE; EVALUATE TRIAL CALENDAR FOR LITIGATION TASKS; REVIEW COURT ORDER DENYING MOTIONS	.6	231.00
8/11/21	TAM	REVIEW EMAIL FROM MR. WISEMAN AND PREPARE TRIAL BUDGET TEMPLATE.	.8	208.00
8/11/21	DG	LEGAL RESEARCH REGARDING [REDACTED] LEGAL RESEARCH REGARDING [REDACTED]	4.2	1,449.00
8/11/21	DG	[REDACTED]; DRAFT MEMO REGARDING ALL JURISDICTIONAL/PROCEDURAL RESEARCH ISSUES.	3.5	1,207.50
8/12/21	BMC	REVIEW/ANALYZE PLAINTIFF'S MOTION FOR ISSUE AND EVIDENCIARY SANCTIONS; DRAFT/REVISE SETTLEMENT CONFERENCE STATEMENT	4.5	2,430.00
8/12/21	TN	PARTICIPATE IN CLIENT CONFERENCE CALL; REVIEW MOTION FOR SANCTIONS; CONSIDER NEXT STEPS IN LITIGATION; REVIEW CLIENT CORRESPONDENCE	1.3	500.50
8/13/21	BMC	REVIEW/ANALYZE ARGUMENTS IN MOTION FOR EVIDENCIARY SANCTIONS; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; REVIEW CASES REGARDING ECONOMIC USE FOR MISAPPROPRIATION FOR TRIAL BRIEF	1.8	972.00
8/13/21	DWW	REVIEW/ANALYSIS OF MOTION FOR SANCTIONS.	.9	558.00
8/13/21	TN	REVIEW PLAINTIFF'S MOTION FOR SANCTIONS; WRITE FACTUAL BACKGROUND FOR OPPOSITION	6.0	2,310.00
8/16/21	BMC	DRAFT/REVISE SETTLEMENT CONFERENCE STATEMENT; REVIEW/ANALYZE PRETRIAL CONFERENCE ORDER AND GUIDELINES FROM J. ALSUP; CONFERENCE WITH D. GOLDSTEIN REGARDING TRIAL PREP AND JURY INSTRUCTIONS; REVIEW/REVISE TRIAL CHECKLIST; DRAFT TRIAL BRIEF	5.5	2,970.00
8/16/21	ANJ	PREPARE SEARCHES AND REVIEW FOR DOCUMENTS RESPONSIVE DOCUMENTS TO RFP 64.	1.3	195.00
8/16/21	DWW	PREPARATION OF TRIAL BUDGET AND REVIEW, REVISE AND EDIT SETTLEMENT CONFERENCE STATEMENT.	6.3	3,906.00
8/16/21	KB	PROOFREAD SETTLEMENT CONFERENCE STATEMENT,	1.0	65.00
8/16/21	TN	DISCUSS NEXT STEPS IN LITIGATION STRATEGY; PARTICIPATE IN CONFERENCE CALL WITH FORENSICS EXPERT TO DISCUSS NEXT STEPS; WORK ON OPPOSITION TO MOTION FOR SANCTIONS	3.4	1,309.00
8/16/21	TAM	REVISE AND EXPAND TRIAL BUDGET FOR MR. WISEMAN.	1.6	416.00
8/16/21	DG	REVIEW DOCKET AND ANALYZE JUDGE ALSUP'S STANDING ORDER ON JURY TRIALS; PREPARE PRE-TRIAL CHECKLIST CHART.	2.0	690.00
8/16/21	DG	LEGAL RESEARCH REGARDING [REDACTED]:		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

File Number DWW R7363-2

8/31/21
1091192
Page 4

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement.



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/21 1091192 5
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/18/21	DWW	TRIAL ORDER.	1.1	682.00
8/18/21	KP	PREPARATION OF NOVOA DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS.	6.7	4,154.00
8/18/21	TN	EMAIL CORRESPONDENCE WITH A. JOHNSON; TROUBLESHOOT RELATIVITY QUERY PER A. JOHNSON; QUERY "SIX CUSTOMERS THAT PLAINTIFF CLAIMS WE MISAPPROPRIATED" PER T. NG.	2.2	385.00
8/18/21	DG	REVIEW CLIENT CORRESPONDENCE; PARTICIPATE IN HEARING RE MOTION TO DISQUALIFY TOMO KIMURA; CONTINUE TO WRITE OPPOSITION TO MOTION FOR SANCTIONS	5.9	2,271.50
8/18/21	DG	CONTINUE RESEARCH REGARDING [REDACTED]	2.5	862.50
8/18/21	DG	[REDACTED]; DRAFT EMAIL MEMO TO B. CARR.		
8/18/21	DG	LEGAL RESEARCH FOR [REDACTED]		
8/18/21	DG	[REDACTED]		
8/18/21	DG	[REDACTED]	5.5	1,897.50
8/18/21	BE	REVIEW STATUS AND TRIAL CHECKLIST. REVIEW STRATEGY FOR MOTIONS IN LIMINE.	.2	75.00
8/19/21	BMC	COMMUNICATIONS WITH D. WISEMAN REGARDING MOTIONS IN LIMINE; DRAFT TRIAL BRIEF; COMMUNICATIONS WITH A. SMITH REGARDING CERTIFIED COPIES OF DEPOSITION TRANSCRIPTS FOR TRIAL; REVIEW/ANALYZE QUINTARA'S SETTLEMENT CONFERENCE STATEMENT	3.8	2,052.00
8/19/21	ANJ	FURTHER DRAFT OF TRIAL EXHIBIT LIST.	7.3	1,095.00
8/19/21	DWW	EMAIL REGARDING MOTIONS IN LIMINE; TELEPHONE CONFERENCE WITH LITIGATION TEAM REGARDING MOTIONS IN LIMINE; PREPARE, REVISE AND EDIT NOVOA DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS; TELEPHONE CONFERENCE WITH T. NG REGARDING STATUS; REVIEW AND EDIT OPPOSITION TO MOTION FOR SANCTIONS; EMAILS WITH M. LIAN REGARDING SERVICES; REVIEW QUINTARA'S SETTLEMENT CONFERENCE STATEMENT; EMAIL CORRESPONDENCE WITH G. WANG RE: [REDACTED]		
8/19/21	DG	[REDACTED] REVISE AND EDIT PROJECT CHART.	7.9	4,898.00
8/19/21	TN	PARTICIPATE IN LITIGATION STRATEGY CALL; REVIEW PLAINTIFF'S CORRESPONDENCE; REVIEW PLAINTIFF'S SETTLEMENT STATEMENT; CONTINUE TO WORK ON OPPOSITION TO MOTION TO SANCTIONS	3.8	1,463.00
8/19/21	DG	CONTINUE CASE LAW RESEARCH REGARDING THE [REDACTED]		
8/19/21	DG	[REDACTED] LEGAL RESEARCH [REDACTED]		
8/19/21	DG	[REDACTED]		
8/19/21	DG	[REDACTED]; DRAFT EMAIL MEMORANDA RE SAME TO T. NG.	4.5	1,552.50
8/19/21	DG	REVIEW RULES REGARDING WHETHER A PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW MUST BE FILED; REVIEW REPLY FILED IN SUPPORT OF MOTION TO EXCLUDE KIMURA TESTIMONY, AND KIMURA DEPOSITION TESTIMONY, FOR USE IN PREPARING MOTIONS IN LIMINE.	1.3	448.50
8/19/21	BE	REVIEW AND DISCUSS MOTIONS IN LIMINE ISSUES AND STRATEGY. DISCUSS UPCOMING TASK ITEMS AND TRIAL PREPARATION. PREPARE MOTIONS IN LIMINE.	1.1	412.50
8/20/21	BMC	DRAFT TRIAL BRIEF; DRAFT JOINT PROPOSED PRE TRIAL ORDER; REVIEW		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/21 1091192 6
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/20/21	ANJ	TRIAL CHECKLIST	4.8	2,592.00
8/20/21	DWW	FURTHER REVISIONS TO TRIAL EXHIBIT LIST AND COMPILATION OF POTENTIAL TRIAL EXHIBITS.	2.6	390.00
8/20/21	TN	REVIEW/ANALYSIS OF DECLARATION OF JON BERRYHILL ISO PLAINTIFF'S MOTION FOR ISSUE, EVIDENTIARY AND MONETARY SANCTIONS; PREPARE DECLARATION OF R. NOVOA IN OPPOSITION TO MOTION FOR SANCTIONS; TELEPHONE CONFERENCE WITH TRIALGRAPHIX REGARDING CHRONOLOGY AND THEME DEVELOPMENT; CORRESPONDENCE WITH A. JABOUR; EMAIL CORRESPONDENCE WITH G. WANG RE: [REDACTED]	5.2	3,224.00
8/20/21	DG	CONTINUE TO WRITE OPPOSITION TO MOTION FOR SANCTIONS; DISCUSS [REDACTED] WITH CLIENT; CONSIDER NEXT STEPS IN LITIGATION STRATEGY	6.8	2,618.00
8/20/21	DG	CREATE OUTLINE FOR JOINT PROPOSED PRETRIAL ORDER; CHECK LOCAL RULES FOR REQUIREMENTS FOR TRIAL BRIEFS.	1.5	517.50
8/20/21	BE	WORK ON MOTION IN LIMINE TO EXCLUDE EVIDENCE THAT CUSTOMER IDENTITIES ARE PROTECTABLE AS TRADE SECRETS; ANALYZE PRIOR ORDER STRIKING TRADE SECRETS; BEGIN DRAFTING.	5.0	1,725.00
8/21/21	BE	DRAFT MOTION IN LIMINE.	3.6	1,350.00
8/22/21	DWW	RESEARCH AND DRAFT MOTION IN LIMINE.	1.0	375.00
8/22/21	BE	REVIEW/REVISION OF OPPOSITION TO MOTION FOR SANCTIONS.	4.8	2,976.00
8/23/21	BMC	DRAFT MOTIONS IN LIMINE.	1.0	375.00
8/23/21	ANJ	DRAFT TRIAL BRIEF; DRAFT PRE-TRIAL CONFERENCE ORDER; CONFERENCE WITH A. JOHNSON REGARDING TRIAL EXHIBITS AND EXHIBIT LIST; REVIEW/ANALYZE OPPOSITION TO SANCTIONS MOTION AND PROVIDE COMMENTS TO T. NG; REVIEW PRE-TRIAL DEADLINES; TRIAL PREP CONFERENCE WITH D. WISEMAN; CONFERENCE WITH TRIAL GRAPHIC CONSULTANTS	5.8	3,132.00
8/23/21	DWW	REVIEW AND BEGIN PREPARATION OF EXHIBITS TO T. NG DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS.	.6	90.00
8/23/21	TN	REVIEW/REVISION OF OPPOSITION TO MOTION FOR ISSUE AND SANCTIONS; REVIEW, REVISE AND EDIT DECLARATION OF R. NOVOA.	7.4	4,588.00
8/23/21	DG	PARTICIPATE IN CONFERENCE CALLS WITH CLIENT AND FORENSIC EXPERT; CONTINUE TO WORK ON OPPOSITION TO MOTION FOR SANCTIONS	6.7	2,579.50
8/23/21	BE	CONTINUE WORK DRAFTING MOTION IN LIMINE TO EXCLUDE EVIDENCE THAT CUSTOMER IDENTITIES ARE PROTECTABLE AS TRADE SECRETS; PRE-TRIAL TEAM CONFERENCE; BEGIN WORK DRAFTING MOTION IN LIMINE TO EXCLUDE FUTURE LOST PROFITS.	5.3	1,828.50
8/24/21	BMC	DRAFT MOTIONS IN LIMINE. DISCUSS STATUS OF TRIAL PREPARATIONS AND MOTIONS IN LIMINE. DISCUSS JURY INSTRUCTIONS AND VERDICT FORM.	4.0	1,500.00
8/24/21	ANJ	DRAFT/REVISE TRIAL BRIEF; DRAFT/REVISE TRIAL GRAPHICS; COMMUNICATIONS WITH T. BINEL REGARDING TRIAL GRAPHICS; ATTEND TRIAL PREP CALL	5.6	3,024.00
8/24/21	ANJ	COMPILE ADDITIONAL EXHIBITS FOR DECLARATION OF T. NG IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS; REVIEW AND ANALYSIS OF DEFENDANTS AND COUNTER-CLAIMANTS DEPOSITION TRANSCRIPTS AND PREPARE EXHIBITS TO WISEMAN DECLARATION IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS; CONFERENCE CALL WITH TEAM: RESEARCH		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		8/31/21 1091192 7
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/24/21	DWW	[REDACTED]. REVIEW/REVISION OF PREPARE MOTIONS IN LIMINE NOS. 7-8; REVISE AND EDIT MOTIONS IN LIMINE NOS. 1-6; REVISE AND EDIT OPPOSITION TO MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS; PREPARE FOR SETTLEMENT CONFERENCE.	6.7	1,005.00
8/24/21	TN	WORK ON OPPOSITION TO MOTION FOR SANCTIONS; WORK ON MOTION IN LIMINE NO. 1 TO EXCLUDE EVIDENCE RELATED TO THE DATABASES; WORK ON TRIAL EXHIBIT LIST; PARTICIPATE IN CONFERENCE CALL WITH THE CLIENT; DISCUSS ISSUES WITH RENE NOVOA; PARTICIPATE IN LITIGATION STRATEGY CONFERENCE CALL	8.7	5,394.00
8/24/21	DG	CONTINUE WORK ON MOTION IN LIMINE TO EXCLUDE FUTURE LOST PROFITS.	8.9	3,426.50
8/24/21	DG	BEGIN WORK ON ADMINISTRATIVE MOTION TO SEAL EXHIBITS FILED IN SUPPORT OF OPPOSITION TO MOTION FOR SANCTIONS.	3.8	1,311.00
8/24/21	DG	PRE-TRIAL TEAM CONFERENCE.	2.5	862.50
8/24/21	BE	RESEARCH AND DRAFT MOTIONS IN LIMINE. DISCUSS STATUS AND TRIAL PREPARATION. PREPARE AND DISCUSS DECLARATIONS TO MOTIONS IN LIMINE. REVISE MOTIONS MOTIONS IN LIMINE.	.3	103.50
8/25/21	BMC	REVIEW/REVISE TRIAL POWERPOINT; COMMUNICATIONS WITH T. BINGEL AND D. WISEMAN REGARDING REVISIONS TO TRIAL POWERPOINT; CONFERENCE WITH D. WISEMAN REGARDING TRIAL PREPARATION; REVIEW/UPDATE TRIAL CHECKLIST; DRAFT/REVISE PRE-TRIAL JOINT ORDER; CONFERENCE WITH D. GOLDSTEIN REGARDING JURY INSTRUCTIONS	4.3	1,612.50
8/25/21	ANJ	REVISE AND UPDATE TRIAL EXHIBIT INDEX; COMPILE DOCUMENTS ON TRIAL INDEX; CONFERENCE CALL TEAM MEETING REGARDING PREPARATION FOR TRIAL.	6.8	3,672.00
8/25/21	DWW	REVIEW/REVISION OF MOTIONS IN LININE 1 THROUGH 8; PREPARE FOR SETTLEMENT CONFERENCE; REVIEW REVISE AND EDIT OPPOSITION TO MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS.	8.2	1,230.00
8/25/21	KB	PROOFREAD DEFENDANT'S OPPOSITION TO MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS.	7.4	4,588.00
8/25/21	KB	PROOFREAD MIL NO. 7 TO EXCLUDE PLAINTIFFS' CLAIM FOR PUNITIVE OR EXEMPLARY DAMAGES, MIL NO. 2 TO EXCLUDE EVIDENCE OF UNIDENTIFIED TRADE SECRETS, AND MIL NO. 4 TO EXCLUDE EVIDENCE OF MISAPPROPRIATION BY FRAUD.	1.2	78.00
8/25/21	TN	CONTINUE TO WORK ON OPPOSITION TO MOTION FOR SANCTIONS; WORK ON TRIAL EXHIBIT LIST; WORK ON MOTION IN LIMINE NO. 1	.9	58.50
8/25/21	DG	PRE-TRIAL TEAM CONFERENCE.	7.8	3,003.00
8/25/21	DG	FINALIZE MOTION TO SEAL AND SUPPORTING DOCUMENTS FOR OPPOSITION TO MOTION FOR SANCTIONS.	.5	172.50
8/25/21	BE	REVISE, AND ADD TO MOTIONS IN LIMINE. RESESARCH AUTHENTICATION ISSUES AND BEST EVIDENCE RULE FOR PRECLUDING ENTRY OF QUINTARA'S CLAIMED TRADE SECRET EVIDENCE. COMPILE DECLARATIONS IN SUPPORT OF MOTIONS IN LIIMINE. DISCUSS STATUS AND KEY TRIAL PREPARATION TASK ITEMS.	2.5	862.50
8/26/21	BMC	RESEARCH [REDACTED] [REDACTED]; COMMUNICATIONS WITH D. WISEMAN REGARDING SUPPLEMENTAL JURISDICTION AND EX-PARTE MOTION TO EXERCISE JURISDICTION ON COUNTERCLAIMS; DRAFT VOIR DIRE QUESTIONS; DRAFT PRE-TRIAL ORDER;	6.2	2,325.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	8/31/21 1091192 8	
Date	Tkpr	Description of Services Rendered	Page	Amount
8/26/21	ANJ	REVIEW ORDER RE DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF TOMO KIMURA; CONFERENCE WITH D. WISEMAN ON ORDER RESETTNG TRIAL DATE	5.5	2,970.00
8/26/21	DWW	REVIEW ADDITIONAL KEY DOCUMENTS, REVISE TRIAL EXHIBIT LIST AND COMPILE POTENTIAL TRIAL EXHIBITS IN PREPARATION FOR TRIAL; CONFERENCE WITH TEAM REGARDING TRIAL PREPARATION AND ADDITIONAL PREPARATION TASKS.	5.2	780.00
8/26/21	TN	REVIEW/ANALYSIS OF AND REVISE MOTIONS IN LIMINE; PARTICIPATE IN CASE MANAGEMENT CONFERENCE WITH G. WANG AND DEFENDANTS; REVIEW MINUTE ORDER FROM MAGISTRATE JUDGE HIXSON; REVIEW ORDER FROM JUDGE ALSUP DISQUALIFYING ROYALTY TESTIMONY AND CONTINUING TRIAL TO DECEMBER; EMAIL CORRESPONDENCE TO LITIGATION TEAM REGARDING SAME; [REDACTED] TO G. WANG	7.2	4,464.00
8/26/21	DG	ATTEND SETTLEMENT CONFERENCE; CONTINUE TO REVIEW PERTINENT DOCUMENTS FOR TRIAL EXHIBITS; CONSIDER NEXT STEPS IN LITIGATION STRATEGY; REVIEW COURT ORDER	4.0	1,540.00
8/26/21	BE	FINALIZE MOTIONS IN LIMINE TO EXCLUDE EVIDENCE OF FUTURE LOST PROFITS AND TO EXCLUDE EVIDENCE THAT CUSTOMER IDENTITIES ARE PROTECTABLE AS TRADE SECRETS; DRAFT THE WISEMAN DECLARATION IN SUPPORT OF ALL MOTIONS IN LIMINE; WORK ON IDENTIFYING EXHIBITS FOR WISEMAN DECLARATION; CONFERENCE REGARDING STRATEGY MOVING FORWARD.	5.8	2,001.00
8/27/21	BMC	DISCUSS RESEARCH FOR [REDACTED]. PREPARE DECLARATION IN SUPPORT OF MOTIONS IN LIMINE AND LOCATE EXHIBITS. FINALIZE MOTIONS IN LIMINE. DISCUSS STATUS AND TRIAL PREPARATION TASK ITEMS AND OUTCOME OF SETTLEMENT CONFERENCE. DEVELOP STRATEGY FOR CONTINUANCE OF TRIAL AND JURY INSTRUCTIONS, REVIEW COURT'S ORDER ON MOTION TO EXCLUDE TESTIMONY AND MODIFYING CASE SCHEDULE. COMMENCE PREPARATION OF JURY INSTRUCTIONS.	3.9	1,462.50
8/27/21	ANJ	COMMUNICATIONS WITH D. WISEMAN REGRADING DECEMBER TRIAL DATE; CONFERENCE WITH D. GOLDSTEIN REGARDING UPDATING PRE-TRIAL DEADLINES TASK LIST; REVIEW/ANALYZE ORDER RESETTNG TRIAL DATE; REVIEW/ANALYZE DOCUMENTS REGARDING LOSSES TO QUINTARA'S SIX ALLEGED CUSTOMERS; REVIEW COMMUNICATIONS FROM J. LI REGARDING DAMAGES DOCUMENTS	1.5	810.00
8/27/21	DWW	REVISE TRIAL EXHIBIT LIST PER D. WISEMAN INSTRUCTION; REVIEW AND ADD ADDITIONAL TRIAL EXHIBITS; PREPARE INVOICE SEARCHES FOR T. NG REVIEW.	3.3	495.00
8/27/21	KP	CORRESPONDENCE WITH WITH LITIGATION TEAM REGARDING WRAPPING UP PROJECTS.	.4	248.00
8/27/21	TN	EMAIL CORRESPONDENCE WITH T. NG; UPDATE RELATIVITY LAYOUT TO INCLUDE "ISSUES" TAG FOR FILTERING PER T. NG.	.3	52.50
8/27/21	BE	CONTINUE TO CONSIDER NEXT STEPS IN LITIGATION IN LIGHT OF RECENT COURT ORDER; REVIEW COUNSEL CORRESPONDENCE RE EXPERT MATERIALS; REVIEW CUSTOMER INVOICES	2.4	924.00
8/30/21	BMC	DISCUSS TRIAL PREPARATIONS AND NEW TRIAL DATE. REVIEW JURY INSTRUCTIONS FORM.	.2	75.00
		REVIEW DECLARATION OF DANIEL PETERSON IN SUPPORT OF DEFENDANTS'		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	8/31/21	1091192
DWW			Page	9

Date	Tkpr	Description of Services Rendered	Hours	Amount
8/30/21	DWW	ADMINISTRATIVE MOTION TO FILE UNDER SEAL; COMMUNICATIONS WITH D. GOLDSTEIN REGARDING RESPONSE TO MOTION TO FILE UNDER SEAL; REVIEW COMMUNICATIONS FORM T. NG REGARDING DAMAGE DOCUMENTS EDITED DOC #46749187V1[BN] - LETTER TO JAMES LI RE EXPERT AND FACT DISCOVERY.DOCX COMPOSED EMAIL TO ASMITH@BUCHALTER.COM, NG, TIFFANY F., CARR, BRANDON M.: FW: DAMAGE DOCUMENTS [IMAN-BN.FID3231313]	.5	270.00
8/30/21	TN	WRITE LETTER TO OPPOSING COUNSEL RE LOST PROFIT AND UNJUST ENRICHMENT DOCUMENTS; CONTINUE TO REVIEW INVOICES FOR PRODUCTION; REVIEW PLAINTIFF'S PLEADINGS AND CORRESPONDENCE	.1	62.00
8/30/21	DG	REVIEW QUINTARA'S DECLARATION IN SUPPORT OF ADMINISTRATIVE MOTION TO FILE UNDER SEAL RE DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS.	2.0	770.00
8/30/21	DG	CONTINUE WORK ON WISEMAN DECLARATION IN SUPPORT OF MOTIONS IN LIMINE AND CONFORMING CITATIONS IN THE MOTIONS.	.2	69.00
8/31/21	DWW	REVIEW/REVISION OF LETTER TO J. LI REGARDING AUGUST 26, 2021 ORDER AND COMPLIANCE.	2.0	690.00
8/31/21	TN	FURTHER REVISE LETTER TO PLAINTIFF RE CUSTOMER INVOICES; REVIEW LETTER FROM PLAINTIFF AND CONSIDER NEXT STEPS IN LITIGATION	1.4	868.00
8/31/21	DG	UPDATE TRIAL CHECKLIST WITH NEW DEADLINES.	.8	308.00
8/31/21	DG	LEGAL RESEARCH REGARDING [REDACTED]	.5	172.50
8/31/21	BE	[REDACTED]	2.5	862.50
8/31/21	BE	RECEIVE AND REVIEW CORRESPONDENCE REGARDING EXPERT AND FACT DISCOVERY, AND ORDER ON DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF TOMO KIMURA.	.1	37.50

Date	Description of Disbursement	CheckNo	Units	Amount
5/04/21	DEPOSITION FEES FIRST LEGAL DEPOSITION SERVICES LLC DEPOSITION FEES - VIDEOGRAPHER, VIDEO PROCESSING OF QUN SHAN; TAKEN ON 04/14/21 - INV.# 65265.	590390		1,501.75
5/24/21	DEPOSITION FEES APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF YI QING CHEN; TAKEN ON 05/05/21 - INV.# 1085882	590383		1,898.25
5/28/21	COURT REPORTER APTUS COURT REPORTING DEPOSITION TRANSCRIPT OF CORENA CLARK; TAKEN ON 05/17/21 - INV.# 1087183	590383		942.21
7/15/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 07/15/21			2.20
7/16/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 07/16/21			2.20
7/19/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 07/19/21			4.40
7/20/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 07/20/21			12.20
7/21/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 07/21/21			8.60
7/27/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	8/31/21 1091192 Page 10
-----------------	---------	---	-------------------------------

Date	Description of Disbursement	CheckNo	Units	Amount
	(CANDC) ON 07/27/21			2.50
7/31/21	MESSENGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN FRANCISCO ON 07/22/21 1606710	590103		845.30
7/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 07/16/21	590086		49.35
8/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY GOLDSTEIN, DAVID ON 07/19/21	590023		39.02
8/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 07/12/21	590023		102.09
8/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 07/14/21	590023		26.01
8/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 07/21/21	590023		13.01

Recap of Services	Hours	Effective Rate	Fees
JASON-ANTHONY SITYAR	2.9	215.00	623.50
BRANDON M. CARR	94.3	540.00	50,922.00
ANTOINETTE N. JOHNSON	47.1	150.00	7,065.00
DYLAN WISEMAN	109.3	620.00	67,766.00
KARYN BALZARY	3.7	65.00	240.50
KEVIN PARKER	6.7	175.00	1,172.50
FLOR VELAZQUEZ	.1	95.00	9.50
TIFFANY NG	74.6	385.00	28,721.00
THOMAS A. MCMANUS	2.4	260.00	624.00
DAVID GOLDSTEIN	85.0	345.00	29,325.00
BERIT ELAM	26.4	375.00	9,900.00
Total	452.5		196,369.00

Total Fees	196,369.00
Total Disbursements	5,449.09

Matter Total	\$ 201,818.09
---------------------	----------------------

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

September 30, 2021
Invoice No. 1097098

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	835,843.88
Payments received through 10/06/21	.00
Previous Balance Remaining	835,843.88
Current Fees Through 09/30/21	74,791.50
Current Disbursements Through 09/30/21	951.59
Invoice Total	\$ 75,743.09
Balance Due	\$ 911,586.97

Client Trust Balance 15,000.00

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
201,818.09	179,284.03	454,741.76	911,586.97

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		9/30/21 1097098 1
Date	Tkpr	Description of Services Rendered	Hours	Amount
8/23/21	EE	RESEARCH [REDACTED].	1.0	185.00
8/24/21	EE	ASSIST WITH RELATIVITY SAVED SEARCHES.	1.3	240.50
9/01/21	BMC	COMMUNICATIONS WITH D. GOLDSTEIN REGARDING NEW PRE-TRIAL DEADLINES; REVIEW/UPDATE DOCKET AND PRE TRIAL DEADLINES; REVIEW LETTER FROM D. WISEMAN TO J. LI REGARDING DISCOVERY OF CUSTOMER INVOICES; RESEARCH [REDACTED]	3.8	2,052.00
9/01/21	DWW	CORRESPONDENCE WITH G. WANG REGARDING [REDACTED]	.9	558.00
9/01/21	TN	REVIEW CORRESPONDENCE TO PLAINTIFF'S COUNSEL RE CUSTOMER INVOICES AND FURTHER CONSIDER NEXT STEPS IN LITIGATION; REVIEW REPLY TO MOTION FOR SANCTIONS	.6	231.00
9/01/21	TN	***NO CHARGE***: WORK ON CLIENT CORRESPONDENCE IN CHINESE	.5	
9/01/21	DG	FURTHER RESEARCH REGARDING [REDACTED]	2.8	966.00
9/01/21	BE	REVIEW CORRESPONDENCE REGARDING JUDGE'S AUGUST 26 ORDER AND DISCOVERY ITEMS.	.1	37.50
9/02/21	BMC	REVIEW/ANALYZE PLAINTIFF'S REPLY ISO MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS AND SUPPORTING DECLARATIONS; RESEARCH [REDACTED]; DRAFT TRIAL BRIEF	4.2	2,268.00
9/02/21	DWW	PREPARATION OF RESPONSE TO SEPTEMBER 1, 2021 LETTER; EMAILS WITH T. NG AND B. CARR REGARDING TRIAL PREPARATION; EMAILS TO T. NG REGARDING COMPLIANCE WITH ORDER TO PRODUCE INVOICES TO QUINTARA ON CONFIDENTIAL BASIS; REVIEW OUTSTANDING INVOCES FROM HAYSTACKID.	4.2	2,604.00
9/02/21	TN	REVISE LETTER TO PLAINTIFF'S COUNSEL RE CUSTOMER LIST	.8	308.00
9/02/21	DG	RESEARCH REGARDING [REDACTED]	4.3	1,483.50
9/03/21	BMC	REVIEW PRE-TRIAL DEADLINE CALENDAR; RESEARCH REGARDING [REDACTED]; DRAFT/REVISE TRIAL BRIEF	2.5	1,350.00
9/03/21	BMC	DRAFT/REVISE PRE-TRIAL JOINT ORDER SUBMISSION	1.5	810.00
9/03/21	DWW	PREPARATION FOR TELEPHONE CONFERENCE WITH G. WANG (NO SHOW) REGARDING COMMUNICATION AND REPRESENTATION ISSUES; PREPARE FURTHER EMAIL REGARDING TELEPHONE CONFERENCE.	2.1	1,302.00
9/03/21	TN	IDENTIFY CUSTOMER INVOICES PER COURT ORDER	2.9	1,116.50
9/03/21	DG	WORK ON RESEARCH AND [REDACTED]	5.2	1,794.00
9/06/21	DWW	PREPARATION OF DRAFT MESSAGE TO G. WANG REGARDING [REDACTED]	2.1	1,302.00
9/07/21	BMC	REVIEW ORDER REGARDING SUPPLEMENTAL RESPONSE RE PLAINTIFF'S MOTION FOR SANCTIONS	.2	108.00
9/07/21	BMC	DRAFT PRE-TRIAL JOINT ORDER SUBMISSION	1.6	864.00
9/07/21	DWW	PREPARATION OF EMAIL TO WANG REGARDING [REDACTED]; CORRESPONDENCE WITH ALL DEFENDANTS REGARDING STRATEGY; REVIEW ORDER FROM JUDGE ALSUP REGARDING SUPPLEMENTAL CLIENT DECLARATIONS; TELEPHONE CONFERENCE WITH T.		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		9/30/21 1097098 2
Date	Tkpr	Description of Services Rendered	Hours	Amount
9/07/21	KP	NG REGARDING CONTENT OF ADDITIONAL DECLARATIONS.	4.7	2,914.00
9/07/21	TN	EMAIL CORRESPONDENCE WITH T. NG; PREPARE CLIENT RELATIVITY PREPRODUCTION REVIEW SEARCH FOR REVIEW; PREPARE DOCUMENTS FOR CLIENT PRODUCTION.	2.7	472.50
9/07/21	DG	MANAGE AND FINALIZE CUSTOMER INVOICE PRODUCTION; CORRESPOND WITH CLIENT RE THE SAME; REVIEW COURT ORDER RE EVIDENCE DESTRUCTION AND CONSIDER NEXT STEPS IN LITIGATION	1.2	462.00
9/07/21	DG	RESEARCH [REDACTED]	2.5	862.50
9/07/21	BE	REVIEW RETAINER AGREEMENT AND PENDING BILLS TO CLIENT TO SUPPORT MOTION TO WITHDRAW AS COUNSEL OF RECORD; BEGIN OUTLINE OF MOTION.	1.6	552.00
9/07/21	DWW	REVIEW CORRESPONDENCE REGARDING STATUS OF CASE. RECEIVE AND REVIEW COURT'S ORDER REGARDING REQUEST FOR SUPPLEMENTAL RESPONSE REGARDING PLAINTIFF'S MOTION FOR SANCTIONS.	.2	75.00
9/08/21	KP	REVIEW QUINTARA'S REPLY BRIEF REGARDING MOTION FOR SANCTIONS AND SUPPORTING DECLARATION; REVIEW, REVISE AND EDIT WANG, LI, WONG AND SHAO DECLARATIONS; REVIEW, REVISE AND EDIT MOTION TO WITHDRAW AS COUNSEL; NUMEROUS EMAIL MESSAGES TO. G. WANG REGARDING REPRESENTATIONAL ISSUES.	5.8	3,596.00
9/08/21	TN	PREPARE AND PRODUCE CLIENT PRODUCTION RUIFENG017, FINALIZE, ENCRRYPT AND UPLOAD TO SHAREFILE; EMAIL CORRESPONDENCE WITH T. NG.	3.0	525.00
9/08/21	DG	MANAGE CUSTOMER INVOICE PRODUCTION; REVIEW CLIENT CORRESPONDENCE; DETERMINE NEXT STEPS IN LITIGATION; PREPARE CLIENT DECLARATIONS; REVIEW MOTION TO WITHDRAW	1.5	577.50
9/09/21	DWW	DRAFT MOTION TO WITHDRAW AS COUNSEL OF RECORD: NOTICE, MEMORANDUM OF POINTS AND AUTHORITIES, AND DECLARATION OF D. WISEMAN.	5.5	1,897.50
9/09/21	DG	REVIEW/REVISION OF MOTION TO WITHDRAW AS COUNSEL; PREPARE FOR HEARING ON MOTION FOR SANCTIONS; CORRESPONDENCE TO G. WANG REGARDING REPRESENTATIONAL ISSUE; PREPARE FOR AND PARTICIPATE IN TELECONFERENCE WITH G. WANG (NO SHOW).	4.6	2,852.00
9/09/21	DG	RESEARCH REGARDING [REDACTED]	2.5	862.50
9/09/21	DG	[REDACTED]; REVIEW JUDGE'S RULES FOR SCHEDULING MOTION HEARINGS.	3.5	1,207.50
9/10/21	TN	APPLY REVISIONS TO MOTION TO WITHDRAW AS COUNSEL OF RECORD. WITH G. WANG REGARDING [REDACTED] TELEPHONE CALL WITH A. LI [REDACTED]	1.1	682.00
9/10/21	DWW	REVIEW CORRESPONDENCE FROM PLAINTIFF RE CUSTOMER INVOICE; REVIEW CLIENT CORRESPONDENCE	.3	115.50
9/13/21	TN	REVIEW/ANALYSIS OF AND PREPARATION OF LETTER TO DEFENDANTS ENCLOSING UPCOMING DEADLINES. PREPARATION FOR HEARING ON MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS.	3.4	2,108.00
9/13/21	DG	REVIEW COURT ORDER REQUESTING SUPPLEMENTAL RESPONSE RE LOST CELLPHONE; MANAGE DISCOVERY ISSUES RE CUSTOMER INVOICES; RESPOND TO OPPOSING COUNSEL'S EMAIL RE CUSTOMER INVOICES; DISCUSS STRATEGY FOR UPCOMING SANCTIONS HEARING	1.5	577.50
9/13/21	DG	REVIEW COURT'S REQUEST FOR SUPPLEMENTARY RESPONSE.	.2	69.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.		9/30/21 1097098 3
Date	Tkpr	Description of Services Rendered	Hours	Amount
9/13/21	EE	RESEARCH [REDACTED]	1.5	277.50
9/14/21	BMC	REVIEW PLAINTIFF'S SUPPLEMENTAL RESPONSE TO MOTION FOR SANCTIONS; COMMUNICATIONS WITH D. WISEMAN REGARDING HEARING ON MOTION FOR SANCTIONS; REVIEW DOCKET AND MEMO FROM D. GOLSTEIN RE PRE-TRIAL DEADLINES	.7	378.00
9/14/21	DWW	MOTION FOR EVIDENTIARY SANCTIONS.	4.1	2,542.00
9/14/21	TN	REVIEW QUINTARA'S RESPONSE; PREPARE FOR SANCTIONS HEARING; CORRESPOND WITH HAYSTACK TO CLARIFY ISSUES	1.2	462.00
9/15/21	BMC	CONFERENCE WITH D. GOLDSTEIN REGARDING MOTION SHORTENING TIME ON WITHDRAWAL MOTION; REVIEW FRCP RULES REGARDING MOTIONS SHORTENING TIME; RESEARCH [REDACTED]	.8	432.00
9/15/21	DWW	PREPARATION FOR AND ARGUE AT HEARING ON QUINTARA'S MOTION FOR ISSUE AND EVIDENTIARY SANCTIONS AT NORTHERN DISTRICT IN SAN FRANCISCO; TELEPHONE CONFERENCE WITH B. CARR REGARDING OUTCOME; TELEPHONE CONFERENCE WITH A. LI [REDACTED].	8.2	5,084.00
9/15/21	TN	PREPARE FOR AND ATTEND MOTION FOR SANCTIONS HEARING	3.4	1,309.00
9/16/21	BMC	DRAFT TRIAL BRIEF; COMMUNICATIONS WITH D. PETERSON REGARDING MISSING INVOICES; REVIEW LOCAL RULES REGARDING ORDER TO SHORTEN TIME ON MOTION; COMMUNICATIONS WITH D. PETERSON REGARDING STIPULATION TO SHORTEN TIME ON MOTION TO WITHDRAWAL; DRAFT MOTION TO SHORTEN TIME ON MOTION TO WITHDRAWAL; REVIEW SUPPLEMENTAL DECLARATION OF D. WISEMAN IN SUPPORT OF MOTION TO WITHDRAWAL	4.8	2,592.00
9/16/21	DWW	REVIEW/REVISION OF WISEMAN DECLARATION REGARDING MOTION TO WITHDRAW.	4.3	2,666.00
9/16/21	TN	REVIEW CORRESPONDENCE TO CLIENT [REDACTED]; REVIEW CORRESPONDENCE FROM OPPOSING COUNSEL; CORRESPOND WITH CLIENT [REDACTED]; REVIEW CUSTOMER INVOICE	1.0	385.00
9/17/21	BMC	CONFERENCE WITH D. GOLDSTEIN REGARDING MOTION TO ADVANCE MOTION TO WITHDRAWAL; REVIEW LOCAL RULES REGARDING MOTION TO ADVANCE	.4	216.00
9/17/21	DWW	CORRESPONDENCE WITH G. WANG REGARDING [REDACTED]	1.1	682.00
9/17/21	TN	REVIEW CLIENT CORRESPONDENCE; REVISE WISEMAN DECLARATION IN SUPPORT OF MOTION TO WITHDRAW; CORRESPOND WITH CLIENT AND OPPOSING COUNSEL RE [REDACTED]	.8	308.00
9/17/21	DG	RESEARCH REGARDING [REDACTED] [REDACTED], MEMORANDUM, DECLARATION, AND PROPOSED ORDER).	5.7	1,966.50
9/18/21	DWW	REVIEW/ANALYSIS OF EXHIBITS FOR SUPPLEMENTAL WISEMAN DECLARATION.	1.8	1,116.00
9/20/21	BMC	DRAFT/REVISE TRIAL BRIEF	2.5	1,350.00
9/20/21	DWW	REVIEW/REVISION OF EX PARTE APPLICATION FOR ORDER SHORTENING TIME TO HAVE HEARD BUCHALTER'S MOTION TO WITHDRAW.	2.1	1,302.00
9/20/21	TN	REVIEW EMAILS IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL	.9	346.50
9/21/21	BMC	DRAFT/REVISE SUBPOENA TO T. KIMURA AND DOCUMENT DEMAND; DRAFT/REVISE NOTICE OF SUBPOENA TO T. KIMURA; DRAFT/REVISE JOINT PRE-TRIAL SUBMISSION; REVIEW PRE-TRIAL DEADLINES AND TASK LIST FROM		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	9/30/21 1097098 4
Date	Tkpr	Description of Services Rendered	Page Hours Amount
9/21/21	DWW	D. GOLDSTEIN	3.5 1,890.00
9/21/21	KP	REVIEW, REVISE AND EDIT EX PARTE APPLICATION FOR ORDER SHORTENING TIME TO HAVE HEARD MOTION TO WITHDRAW AND SUPPORTING PAPERS.	1.5 930.00
9/21/21	TN	EMAIL CORRESPONDENCE WITH T. NG; STAGE CLIENT "INVOICES" DOCUMENTS, PROCESS AND UPLOAD TO RELATIVITY FOR PRODUCTION; PREPARE DOCUMENTS FOR CLIENT PRODUCTION RUIFENG018, PRODUCE, EXPORT, FINALIZE AND UPLOAD TO SHAREFILE FOR DELIVERY.	4.0 700.00
9/21/21	DWW	REVIEW WISEMAN DELCARATION; COMPILE EXHIBITS IN SUPPORT OF DECLARATION FOR MOTION TO WITHDRAW; REVIEW CUSTOMER INVOICES FOR PRODUCTION; CORRESPOND WITH OPPOSING COUNSEL RE CUSTOMER INVOICES	3.4 1,309.00
9/23/21	BMC	REVIEW/ANALYSIS OF COURT DOCKET REGARDING EX PARTE APPLICATION.	.2 124.00
9/24/21	DWW	REVIEW ORDER SETTING IN-PERSON HEARING FOR MOTION TO WITHDRAW AS COUNSEL; UPDATE DOCKET; REVIEW DEADLINES FOR PRE TRIAL FILINGS; DRAFT/REVISE TRIAL BRIEF	1.5 810.00
9/24/21	TN	REVIEW/ANALYSIS OF ORDER FROM COURT REQUIRING PERSONAL APPEARANCES; CORRESPONDENCE TO DEFENDANTS REGARDING SAME.	.4 248.00
9/24/21	BMC	REVIEW COURT ORDER RE MOTION TO WITHDRAW; CONSIDER NEXT STEPS IN LITIGATION	.2 77.00
9/27/21	DWW	REVIEW OPPOSITION TO MOTION TO WITHDRAWAL; COMMUNICATIONS WITH T. NG REGARDING MOTION TO CHANGE HEARING ON MOTION TO WITHDRAWAL	.4 216.00
9/27/21	TN	PREPARATION OF EX PARTE APPLICATION FOR G. WANG TO CONTINUE OCTOBER 7, 2021 HEARING DATE AND DECEMBER 6, 2021 TRIAL.	2.5 1,550.00
9/27/21	BMC	PREPARE EX PARTE APPLICATION TO CONTINUE HEARING AND TRIAL; CORRESPOND WITH CLIENT RE THE SAME	1.7 654.50
9/28/21	DWW	REVIEW ORDER ON INTERPRETER FOR HEARING; REVIEW EX PARTE PAPERS TO CONTINUE MOTION TO WITHDRAWAL HEARING	.4 216.00
9/28/21	TN	REVIEW/REVISION OF GANGYOU WANG'S EX PARTE APPLICATION; NOTICE OF DEPOSITION FOR T. KIMURA.	2.5 1,550.00
9/28/21	BMC	REVIEW COURT ORDER; CONSIDER NEXT STEPS IN LITIGATION	.2 77.00
9/30/21	DWW	REVIEW ORDER RE HEARING ON MOTION TO WITHDRAWAL	.1 54.00
9/30/21	TN	REVIEW/ANALYSIS OF COURT'S ORDER REGARDING G. WANG'S EX PARTE HEARING; REVIEW EXPERT REPORT FROM T. KIMURA.	1.4 868.00
9/30/21		REVIEW COURT ORDER RE WITHDRAWAL MOTION; CONSIDER NEXT STEPS IN LITIGATION	.3 115.50

Date	Description of Disbursement	CheckNo	Units	Amount
8/16/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 08/16/21			2.70
8/22/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 08/22/21			8.10
8/30/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 08/30/21			.40
8/31/21	MESSINGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	9/30/21 1097098 Page 5
------------------------	----------------	--	---------------------------------------

Date	Description of Disbursement	CheckNo	Units	Amount
	FRANCISCO ON 08/26/21 1606982	590848		46.75
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/05/21	590632		127.89
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/06/21	590632		15.98
8/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 08/06/21	590632		8.56
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/09/21	590632		31.96
8/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 08/10/21	590632		8.56
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/10/21	590632		31.95
8/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 08/10/21	590632		34.23
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/19/21	590632		31.96
8/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 08/24/21	590632		31.96
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY GOLDSTEIN, DAVID ON 08/10/21	590868		19.56
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY GOLDSTEIN, DAVID ON 08/11/21	590868		9.78
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/02/21	590868		69.13
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/03/21	590868		34.57
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/10/21	590868		11.52
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/19/21	590868		108.26
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/23/21	590868		69.13
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/24/21	590868		65.65
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/26/21	590868		9.78
9/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN, DYLAN ON 08/31/21	590868		9.78
9/15/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 7/20/21 MILEAGE TO/ FROM SAN FRANCISCO OFFICE FOR HEARING APPEARANCE (MILES 170.80)			98.21
9/15/21	[REDACTED]			52.36
9/15/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 750125590 DATED: 9/15/21 TRACKING# 774773493563 ON 09/10/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: OFFICE OF THE CLERK - JUDGE AL, UNITED STATES DISTRICT			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File
Number
DWW

R7363-2

RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A.
QUINTARA BIOSCIENCES, INC.

9/30/21
1097098
Page 6

Date	Description of Disbursement	CheckNo	Units	Amount
	COURT, 450 GOLDEN GATE AVE, 16TH FLOO, SAN FRANCISCO, CA 94102	590747		12.86

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	28.9	540.00	15,606.00
DYLAN WISEMAN	59.0	620.00	36,580.00
KEVIN PARKER	9.7	175.00	1,697.50
TIFFANY NG	21.9	385.00	8,431.50
	.5		No Charge
DAVID GOLDSTEIN	33.8	345.00	11,661.00
ED EPPRIGHT	3.8	185.00	703.00
BERIT ELAM	.3	375.00	112.50
Total	157.9		74,791.50

Total Fees 74,791.50
Total Disbursements 951.59

Matter Total \$ 75,743.09

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

October 31, 2021
Invoice No. 1102338

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	911,586.97
Payments received through 11/04/21	15,000.00-
Previous Balance Remaining	896,586.97
Current Fees Through 10/31/21	41,455.50
Current Disbursements Through 10/31/21	1,724.31
Invoice Total	\$ 43,179.81
Balance Due	\$ 939,766.78

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
75,743.09	201,818.09	619,025.79	939,766.78

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/21 1102338 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/01/21	BMC	REVIEW/ANALYZE T. KIMURA EXPERT REPORT; RESEARCH REGARDING EFFECT OF INABILITY TO DETERMINE DAMAGES IN EXPERT REPORT; RESEARCH [REDACTED]	2.8	1,512.00
10/01/21	DWW	REVIEW/ANALYSIS OF TOMO KIMURA SUPPLEMENTAL DAMAGES REPORT.	1.2	744.00
10/01/21	DWW	REVIEW/ANALYSIS OF UPCOMING DEADLINES AND EMAIL TO T. NG REGARDING SAME.	1.1	682.00
10/01/21	TN	REVIEW TOMO KIMURA'S REPORT	.8	308.00
10/05/21	BMC	REVIEW/ANALYZE PRE-TRIAL DEADLINES AND REQUIRED FILINGS FOR TRIAL	.4	216.00
10/05/21	TN	CONSIDER NEXT STEPS IN LITIGATION IN LIGHT OF UPCOMING HEARING	.4	154.00
10/06/21	DWW	PREPARATION FOR HEARING ON MOTION FOR BUCHALTER TO WITHDRAW AS COUNSEL FOR DEFENDANTS.	2.1	1,302.00
10/07/21	BMC	REVIEW/ANALYZE ORDER ON MOTION TO WITHDRAWAL; COMMUNICATIONS WITH D. WISEMAN REGARDING HEARING ON MOTION TO WITHDRAWAL	.4	216.00
10/07/21	DWW	PREPARATION FOR PREPARE FOR AND ATTEND HEARING ON MOTION TO WITHDRAW; MEETINGS WITH A. WONG AND R. SHAO; CORRESPONDENCE WITH L. DISSTON.	6.3	3,906.00
10/07/21	TN	PREPARE FOR AND ATTEND MOTION TO WITHDRAW HEARING; REVIEW COURT ORDER; DRAFT EMAIL TO DEFENDANTS	3.2	1,232.00
10/08/21	DWW	TELEPHONE CONFERENCE WITH L. VENGER.	.2	124.00
10/11/21	BMC	REVIEW/ANALYZE OBJECTIONS TO T. KIMURA SUBPOENA	.3	162.00
10/11/21	DWW	PREPARATION FOR T. KIMURA DEPOSITION.	2.4	1,488.00
10/12/21	DWW	PREPARATION FOR DEPOSITION OF T. KIMURA; REVIEW EMAIL FROM COUNSEL FOR QUINTARA REGARDING MOVING DEPOSITION TO FRIDAY, OCTOBER 15, 2021.	1.4	868.00
10/12/21	TN	REVIEW VARIOUS CORRESPONDENCE RE STATUS OF LITIGATION AND UPCOMING DEPOSITION; REVIEW COURT'S RULING RE OFFER OF PROOF	.6	231.00
10/13/21	DWW	REVIEW/ANALYSIS OF KIMURA SUPPLEMENTAL REPORT TO PREPARE FOR DEPOSITION.	1.1	682.00
10/13/21	TN	REVIEW CORRESPONDENCE FROM DISSTON AND PLAINTIFF; CONSIDER NEXT STEPS IN LITIGATION IN LIGHT OF SITUATION	.6	231.00
10/14/21	BMC	REVIEW ORDER REGARDING DEFAULT OF CORPORATION IF NO COUNSEL; COMMUNICATIONS WITH D. WISEMAN REGARDING SAME; REVIEW QUINTARA'S 10/14 DOCUMENT PRODUCTION	1.2	648.00
10/14/21	TN	REVIEW COURT ORDER; REVIEW PLAINTIFF AND CLIENT CORRESPONDENCE	.2	77.00
10/14/21	DG	RESEARCH INTO [REDACTED]	2.5	862.50
10/15/21	DWW	PREPARATION FOR AND TAKE DEPOSITION OF T. KIMURA; TELEPHONE CONFERENCE AND EMAIL MESSAGES TO A LI AND OTHER REGARDING [REDACTED] TELEPHONE CONFERENCE WITH L. DISSTON REGARDING SAME.	2.6	1,612.00
10/15/21	KP	DOWNLOAD T. KIMURA PRODUCTION, EXTRACT AND STAGE ON THE NETWORK; TROUBLESHOOT T. KIMURA PRODUCTION ISSUES, CREATE LOAD FILES, UPLOAD TO RELATIVITY AND IMAGE AND OCR FOR SEARCHABILITY.	2.2	385.00
10/18/21	BMC	REVIEW ORDER ON SERVICE TO DEFENDANTS; COMMUNICATIONS WITH T. NG REGARDING TRIAL DEADLINES AND TASKS	.4	216.00
10/18/21	DWW	TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTARA REGARDING SETTLEMENT AND RELEASE OF WONG AND SHAO; EMAIL CORRESPONDENCE TO T. NG REGARDING SAME; TELEPHONE CONFERENCE AND EMAIL		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/21 1102338 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/18/21	TN	MESSAGES TO G. GOLDSTEIN REGARDING RES JUDICATA AND COLLATERAL ESTOPPEL ISSUES OF STIPULATED JUDGMENT.	.8	496.00
10/18/21	DG	FURTHER CONSIDER NEXT STEPS IN LITIGATION; REVIEW COURT ORDER RESEARCH REGARDING [REDACTED]	.9	346.50
10/18/21	DG	[REDACTED]	4.8	1,656.00
10/18/21	DG	RESEARCH [REDACTED]	2.5	862.50
10/19/21	BMC	COMMUNICATIONS WITH D. GOLDSTEIN REGARDING RESEARCH ON [REDACTED]; CONFERENCE WITH D. WISEMAN REGARDING STIPULATED JUDGMENT AND SETTLEMENT AGREEMENT; CONFERENCE WITH D. GOLDSTEIN REGARDING GOOD FAITH SETTLEMENT MOTION; RESEARCH [REDACTED]	1.2	648.00
10/19/21	DWW	TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTARA REGARDING SETTLEMENT FOR WONG AND SHAO; PREPARE EMAIL MESSAGES CONFIRMING TERMS; EMAIL MESSAGE TO T. NG, B. CARR AND B. ELAM REGARDING SHORT CONFERENCE CALL BECAUSE OF LIKELY SETTLEMENT WITH QUINTARA.	1.7	1,054.00
10/19/21	TN	REVIEW EMAIL FROM RUIFENG; [REDACTED]	1.0	385.00
10/19/21	DG	DRAFT EMAIL MEMORANDUM TO D. WISEMAN REGARDING RES JUDICATA/COLLATERAL ESTOPPEL EFFECT OF STIPULATED JUDGMENT.	1.5	517.50
10/19/21	DG	LEGAL RESEARCH REGARDING [REDACTED]	5.5	1,897.50
10/20/21	DWW	TELEPHONE CONFERENCE WITH WITH D. GOLDSTEIN REGARDING IMPACT OF SETTLEMENT UPON NON-SETTLING DEFENDANTS.	.3	186.00
10/20/21	TN	REVIEW VARIOUS CORRESPONDENCE RE STATUS OF LITIGATION; CONSIDER NEXT STEPS IN LITIGATION	.2	77.00
10/20/21	DG	CONTINUE RESEARCH REGARDING THE [REDACTED]	3.7	1,276.50
10/21/21	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING SETTLEMENT TERMS; RESEARCH REGARDING [REDACTED]; EMAIL CORRESPONDENCE WITH HAYSTACK ID REGARDING STATUS.	1.4	868.00
10/21/21	TN	REVIEW LITIGATION CORRESPONDENCE AND CONSIDER NEXT STEPS IN LITIGATION	.2	77.00
10/21/21	BE	REVIEW STATUS OF CASE AND TRIAL.	.1	37.50
10/22/21	BMC	PRE-TRIAL DEADLINE CONFERENCE WITH D. WISEMAN; REVIEW PRE-TRIAL DEADLINES	.6	324.00
10/22/21	DWW	REVIEW/ANALYSIS OF SETTLEMENT AGREEMENT FROM QUINTARA.	1.1	682.00
10/22/21	TN	PARTICIPATE IN LITIGATION STRATEGY CALL AND CONSIDER NEXT STEPS IN LITIGATION; REVIEW LITIGATION CORRESPONDENCE; CURSORY REVIEW OF SETTLEMENT AGREEMENT AND STIPULATED JUDGMENT	.5	192.50
10/22/21	BE	DISCUSS STATUS OF LITIGATION AND SETTLEMENT AGREEMENT WITH TWO		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/21 1102338 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/25/21	DWW	DEFENDANTS. REVIEW PENDING TRIAL DEADLINES. REVIEW/ANALYSIS OF RESEARCH REGARDING [REDACTED] [REDACTED]; REVIEW, REVISE AND EDIT SETTLEMENT AGREEMENT TO REFLECT STANDARD OF PERJURY UNDER PENAL CODE 118; TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTARA REGARDING ITS BAD FAITH INSISTENCE UPON A STIPULATED JUDGMENT; TELEPHONE CONFERENCE WITH A. WONG AND R. SHAO REGARDING [REDACTED] [REDACTED]	.4	150.00
10/25/21	TN	REVIEW CORRESPONDENCE FROM PLAINTIFF AND CLIENT; CONSIDER NEXT STEPS IN LITIGATION	2.3	1,426.00
10/25/21	DG	REVIEW PROPOSED SETTLEMENT AGREEMENT; CONFERENCE WITH D. WISEMAN RE SAME.	.5	192.50
10/26/21	DWW	REVIEW/REVISION OF SETTLEMENT AGREEMENT AND STIPULATED JUDGMENT FOR WONG AND SHAO; EMAIL CORRESPONDENCE WITH COUNSEL FOR QUINTARA; TELEPHONE CONFERENCE WITH COUNSEL FOR QUINTARA; TELEPHONE CONFERENCE WITH A. WONG REGARDING [REDACTED].	.5	172.50
10/26/21	TN	REVIEW VARIOUS CORRESPONDENCE FROM CLIENTS RE [REDACTED] CONSIDER NEXT STEPS IN LITIGATION	2.1	1,302.00
10/27/21	DWW	CORRESPONDENCE WITH AND TELEPHONE CONFERENCES WITH A. WONG AND R. SHAO REGARDING [REDACTED] [REDACTED] EMAIL TO COUNSEL FOR QUINTARA REGARDING NEEDING ADDITIONAL TIME TO CONSIDER.]	.4	154.00
10/27/21	DWW	REVIEW/ANALYSIS OF EMAIL CORRESPONDENCE FROM DISBARRED LAWYER CLAIMING TO REPRESENT RUIFENG; REVIEW AND RESPOND TO EMAIL MESSAGE FROM A. LI [REDACTED].	.8	496.00
10/27/21	TN	REVIEW CLIENT CORRESPONDENCE; CONSIDER NEXT STEPS IN LITIGATION IN LIGHT OF CIRCUMSTANCES	.6	372.00
10/27/21	DG	RESEARCH REGARDING [REDACTED] [REDACTED]; DRAFT EMAIL MEMORANDUM TO D. WISEMAN; ADDITIONAL RESEARCH REGARDING [REDACTED] [REDACTED]	1.8	693.00
10/28/21	DWW	TELEPHONE CONFERENCE WITH A. WONG REGARDING [REDACTED] [REDACTED]	3.1	1,069.50
10/28/21	DG	RESEARCH REGARDING [REDACTED] [REDACTED]	.3	186.00
10/28/21	DG	BEGIN OUTLINING MOTION FOR GOOD FAITH SETTLEMENT.	2.5	862.50
10/29/21	DWW	TELEPHONE CONFERENCE WITH WITH A. WONG AND R. SHAO REGARDING [REDACTED]; TELEPHONE CONFERENCE WITH A. LI REGARDING [REDACTED] FINAL REVISIONS AND EDITS TO SETTLEMENT AGREEMENT; TRANSMIT SIGNED COPIES OF AGREEMENT TO COUNSEL FOR QUINTARA; REVIEW AND RESPOND TO EMAIL FROM COUNSEL FOR QUINTARA REGARDING NOTICE OF SETTLEMENT.	1.2	414.00
10/29/21	KP	EMAIL CORRESPONDENCE WITH T. NG; ARCHIVE CLIENT CASE DATA AND PREPARE COPY FOR TRANSFER TO NEW COUNSEL.	1.6	992.00
10/29/21	DG	CASE LAW AND STATUTORY LAW RESEARCH [REDACTED] [REDACTED] [REDACTED] BEGIN DRAFTING MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	5.0	875.00
			4.5	1,552.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 10/31/21 1102338 Page 4

Date	Tkpr	Description of Services Rendered	Hours	Amount
10/31/21	DG	CONTINUE WORK DRAFTING MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR GOOD FAITH SETTLEMENT.	3.2	1,104.00

Date	Description of Disbursement	CheckNo	Units	Amount
9/07/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/07/21			.10
9/13/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/13/21			.10
9/17/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/17/21			5.40
9/24/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/24/21			.10
9/27/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/27/21			1.00
9/30/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 09/30/21			.10
9/30/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 09/08/21	591269		13.21
9/30/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 09/09/21	591269		26.44
9/30/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 09/10/21	591269		21.22
9/30/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 09/10/21	591269		39.66
10/04/21	DEPOSITION FEES ANA M. DUB.CSR# 7445 U.S. DISTRICT COURT HEARING TRANSCRIPT	590893		65.10
10/07/21	OUTSIDE SERVICES AWESOME LINGUISTIC SOLUTION INTERPRETATION FOR MIMI DURING 10/7/2021 HEARING - INV.# 1866	591069		1,050.00
10/08/21	[REDACTED]			30.87
10/15/21	TRAVEL EXPENSES TIFFANY NG EXPENSE REPORT - 9/30/21 UBER TO ATTEND MOTION FOR SANCTIONS HEARING.			68.46
10/22/21	OTHER: VENDOR DIRECT SOLUTIONS, LLC EXHIBITS FOR CASE	591276		402.55

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	7.3	540.00	3,942.00
DYLAN WISEMAN	31.4	620.00	19,468.00
KEVIN PARKER	7.2	175.00	1,260.00
TIFFANY NG	11.3	385.00	4,350.50
DAVID GOLDSTEIN	35.5	345.00	12,247.50
BERIT ELAM	.5	375.00	187.50
Total	93.2		41,455.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

Buchalter

1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	10/31/21 1102338 Page 5
-----------------	---------	---	-------------------------------

Date	Description of Disbursement	CheckNo	Units	Amount
Total Fees				41,455.50
Total Disbursements				1,724.31
Matter Total				\$ 43,179.81

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

November 30, 2021
Invoice No. 1108351

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	939,766.78
Payments received through 12/06/21	.00
Previous Balance Remaining	939,766.78
Current Fees Through 11/30/21	38,046.50
Current Disbursements Through 11/30/21	698.98
Invoice Total	\$ 38,745.48
Balance Due	\$ 978,512.26

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard

go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
43,179.81	75,743.09	820,843.88	978,512.26

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/21 1108351 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/01/21	DWW	REVIEW/ANALYSIS OF CORRESPONDENCE WITH COUNSEL FOR QUINTARA REGARDING FULLY EXECUTED SETTLEMENT AGREEMENT AND NOTICE OF SETTLEMENT; TELEPHONE CONFERENCE WITH T. NG REGARDING SAME; EMAIL COMMUNICATIONS WITH BUCHALTER LITIGATION SUPPORT AND FILE TRANSFER PERSONNEL REGARDING PRODUCTION OF EXTERNAL EMAIL MESSAGES; TELEPHONE CONFERENCE WITH A. LI REGARDING [REDACTED].	1.4	868.00
11/01/21	KP	PREPARE AND EXPORT RELATIVITY DATABASE, COMPRESS DATA, AND COPY TO HARD DRIVE FOR TRANSFER TO NEW COUNSEL; ENCRYPT EXTERNAL HARD DRIVE FOR TRANSFER OF DATA TO NEW COUNSEL.	7.5	1,312.50
11/01/21	TN	REVIEW COUNSEL CORRESPONDENCE; EVALUATE CASE FILES; REVIEW AUTHORITIES RE NOTICE OF CONDITIONAL SETTLEMENT	1.9	731.50
11/01/21	DG	LEGAL RESEARCH TO [REDACTED]	4.8	1,656.00
11/01/21	DG	PREPARE DECLARATION OF D. WISEMAN IN SUPPORT OF MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	1.5	517.50
11/02/21	BMC	REVIEW STIPULATION FOR ENTRY OF JUDGMENT	.2	108.00
11/02/21	DWW	REVIEW/ANALYSIS OF TRIAL SCHEDULING ORDER FOR DECEMBER 7, 2021.	.3	186.00
11/02/21	KP	EMAIL CORRESPONDENCE WITH T. NG RE REVIEW OF CLIENT DATA PRIOR TO TRANSFER TO NEW COUNSEL; ARCHIVE CLIENT AND OPPOSING PRODUCTIONS.	3.2	560.00
11/02/21	TN	MANAGE CLIENT FILE RETURN ISSUES; REVIEW COURT ORDER	.6	231.00
11/03/21	ANJ	***NO CHARGE***: REVIEW DEPOSITION TRANSCRIPTS AND DEPOSITION EXHIBITS FOLDERS FOR NON-ATTORNEYS' EYES ONLY FILE TRANSMITTAL.	2.2	
11/03/21	DWW	CORRESPONDENCE WITH COUNSEL FOR QUINTARA RE: ENCLOSED SETTLEMENT CHECKS.	.2	124.00
11/03/21	KP	EMAIL CORRESPONDENCE WITH T. NG; STAGE, PROCESS AND FINALIZE BUCHALTER FILESITE DATA FOR RELATIVITY REVIEW.	6.6	1,155.00
11/03/21	TN	REVIEW ATTORNEY EYES ONLY DEPOSITION TRANSCRIPTS FOR FILE RETURN PURPOSES AND HANDLE OTHER ISSUES RELATED TO FILE RETURN	1.6	616.00
11/03/21	DG	DRAFT NOTICE OF MOTION AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	5.8	2,001.00
11/04/21	ANJ	REVIEW PLEADINGS FILE FOR NON-ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL FOR FILE TRANSMITTAL.	4.4	660.00
11/04/21	KP	EMAIL CORRESPONDENCE WITH T. NG AND A. JOHNSON; RESET A. JOHNSON RELATIVITY CREDENTIALS; COMPRESS RELATIVITY EXPORTS FOR COPY AND TRANSFER TO HARD DRIVE FOR TRANSFER TO CLIENT.	2.3	402.50
11/04/21	TN	CORRESPOND WITH ALAN LI RE [REDACTED]; HANDLE ISSUES RE FILE TRANSMISSION	.7	269.50
11/04/21	DG	PREPARE PROPOSED ORDER GRANTING MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	.5	172.50
11/05/21	ANJ	REVIEW PLEADINGS FILE FOR NON-ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL FOR FILE TRANSMITTAL.	4.5	675.00
11/05/21	DWW	REVIEW/REVISION OF MOTION FOR GOOD FAITH SETTLEMENT AND SUPPORTING PAPERS.	3.8	2,356.00
11/05/21	KP	EMAIL CORRESPONDENCE WITH A. JOHNSON; ARCHIVE CLIENT CASE DATA AND PREPARE COPY FOR TRANSFER TO CLIENT; COPY CLIENT DATA AND		

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/21 1108351 2	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/05/21	TN	DEPOSITIONS TO HARD DRIVE FOR TRANSFER TO NEW CLIENT	3.0	525.00
11/05/21	DG	MANAGE FILE REVIEW ISSUES	.3	115.50
11/05/21	DG	IDENTIFY EXHIBITS IN SUPPORT OF MOTION FOR GOOD FAITH SETTLEMENT THAT MAY NEED TO BE SEALED.	.5	172.50
11/05/21	DG	FINAL REVIEW OF MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION; DIRECT FILING.	1.1	379.50
11/08/21	ANJ	REVIEW PLEADINGS FILE FOR NON-ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL FOR FILE TRANSMITTAL.	6.7	1,005.00
11/08/21	DWW	CORRESPONDENCE WITH L. VENGER REGARDING STATUS UPDATE FOR SETTLEMENT.	.2	124.00
11/08/21	TN	CONTINUE TO MANAGE FILE TRANSFER ISSUES	.3	115.50
11/09/21	ANJ	REVIEW PLEADINGS FILE FOR NON-ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL FOR FILE TRANSMITTAL.	4.3	645.00
11/09/21	KP	EMAIL CORRESPONDENCE WITH T. NG; COPY "03_TRANSCRIPTS - COURT , DEPOSITIONS" TO EXTERNAL HARD DRIVE FOR TRANSFER TO CLIENT PER T. NG; ENCRYPT AND UPLOAD "03_TRANSCRIPTS - COURT , DEPOSITIONS" TO SHAREFILE FOR TRANSFER TO CLIENT PER T. NG.	2.0	350.00
11/10/21	ANJ	REVIEW PLEADINGS FILE FOR DRAFTS AND SEALED DOCUMENTS.	.4	60.00
11/11/21	ANJ	REVIEW PLEADINGS FILE FOR EXCLUSION OF ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL FOR FILE TRANSMITTAL.	3.7	555.00
11/12/21	ANJ	REVIEW PLEADINGS AND EXCLUDE ATTORNEYS' EYES ONLY DOCUMENTS.	1.4	210.00
11/12/21	KP	EMAIL CORRESPONDENCE WITH T. NG; COMPRESS AND UPLOAD CLIENT DATA "03-07 FOLDERS" TO SHAREFILE FOR TRANSFER TO CLIENT PER T. NG.	3.8	665.00
11/12/21	TN	REVIEW CLIENT CORRESPONDENCE AND COURT ORDERS	.3	115.50
11/15/21	ANJ	REVIEW PLEADINGS FILE FOR ATTORNEYS' EYES ONLY AND SEALED DOCUMENTS.	2.5	375.00
11/15/21	DWW	CORRESPONDENCE WITH COUNSEL OF RECORD FOR DEFENDANTS REGARDING FILE PRODUCTION.	.2	124.00
11/15/21	TN	CORRESPOND WITH NEW COUNSEL; MANAGE FILE TRANSFER ISSUES	2.5	962.50
11/16/21	ANJ	REVIEW PLEADINGS FILE TO SEPARATE ATTORNEYS' EYES ONLY DOCUMENTS.	3.9	585.00
11/16/21	DWW	REVIEW/ANALYSIS OF EMAIL CORRESPONDENCE FROM NEW COUNSEL FOR RUIFENG RE INTENT TO "VACATE" PROTECTIVE ORDER; EMAIL COMMUNICATIONS WITH SAME RE: BLOCKING FROM EMAIL; EMAIL CORRESPONDENCE TO COUNSEL FOR QUINTARA SEEKING GUIDANCE FOR RUIFENG'S LAWYER'S ODD REFUSAL TO SIGN THE PROTECTIVE ORDER.	.6	372.00
11/16/21	TN	CORRESPOND WITH NEW COUNSEL; REVIEW CLIENT FILE FOR TRANSFER	4.9	1,886.50
11/17/21	ANJ	REVIEW FILE AND SEARCH TO SEPARATE ATTORNEYS' EYES ONLY DOCUMENTS AS COUNSEL WILL NOT AGREE TO PROTECTIVE ORDER.	6.4	960.00
11/17/21	KP	COMPRESS "02_PLEADINGS" AND UPLOAD TO SHAREFILE FOR TRANSFER TO CLIENT; EMAIL CORRESPONDENCE WITH T. NG; QUERY INTERNAL EMAILS IN RELATIVITY AND BATCH TAG AS RESPONSIVE AND NOT PRIVELEGED PER T. NG.	3.3	577.50
11/17/21	TN	HANDLE FILE TRANSFER ISSUES; PREPARE FOR CASE MANAGEMENT HEARING	7.4	2,849.00
11/18/21	ANJ	BEGIN REVIEW OF EMAILS TO REMOVE ATTORNEYS' EYES ONLY DOCUMENTS.	4.9	735.00
11/18/21	KP	PREPARE AND COPY ORIGINAL DEPOSITIONS/VIDEOS TO HARD DRIVE FOR TRANSFER TO CLIENT; EMAIL CORRESPONDENCE WITH T. NG.	4.5	787.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/21 1108351 3	
Date	Tkpr	Description of Services Rendered	Hours	Amount
11/18/21	TN	PREPARE FOR AND ATTEND CASE MANAGEMENT CONFERENCE; HANDLE ADDITIONAL FILE TRANSFER ISSUES	4.8	1,848.00
11/19/21	ANJ	QC SEARCHES ON EMAIL; REVIEW CORRESPONDENCE FILES FOR ATTORNEYS' EYES ONLY MATERIAL.	6.1	915.00
11/19/21	DWW	TELEPHONE CONFERENCE WITH T. NG REGARDING NOVEMBER 18, 2021 HEARING.	.2	124.00
11/19/21	KP	EMAIL CORRESPONDENCE WITH T. NG; QUERY DOCUMENTS AND PREPARE FILESITE EMAIL PREPRODUCTION RELATIVITY SEARCHES FOR REVIEW AND PRODUCTION; QUERY FILESITE EMAIL DOCUMENTS FOR "NOT TO/FROM/CC "BWGS" OR "RFBIO" FOR RELATIVITY REVIEW PER T. NG.	2.4	420.00
11/19/21	TN	HANDLE FILE TRANSFER ISSUES; CORRESPOND WITH NEW COUNSEL	2.4	924.00
11/22/21	ANJ	REVIEW FILES FOR ATTORNEYS' EYES ONLY AND SEALED DOCUMENTS.	2.9	435.00
11/22/21	DWW	REPLY TO MOTION FOR GOOD FAITH SETTLEMENT.	.6	372.00
11/22/21	KP	COPY OPPOSING AND 3RD PARTY PRODUCTIONS TO HARD DRIVE FOR DELIVERY TO CLIENT; EXPORT 02_PLEADINGS (NOT CONFIDENTIAL-AEO), COMPRESS AND UPLOAD TO SHAREFILE FOR DELIVERY; EMAIL W TONI AND TIFFANY; COMPRESS AND UPLOAD 04 & 05 (NOT CONFIDENTIAL-AEO).ZIP TO SHAREFILE FOR DELIVERY.	3.2	560.00
11/22/21	TN	CONTINUE TO HANDLE FILE TRANSFER ISSUES	1.2	462.00
11/22/21	DG	PREPARE RESPONSE TO QUINTARA'S NON-OPPOSITION TO MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	2.1	724.50
11/23/21	KP	EMAIL CORRESPONDENCE WITH T. NG; COMPRESS AND UPLOAD "07_CORRESPONDENCE (NOT CONFIDENTIAL-AEO)" TO SHAREFILE FOR TRANSFER.	1.0	175.00
11/23/21	TN	CORRESPOND WITH NEW COUNSEL RE FILE TRANSFER ISSUES	.2	77.00
11/24/21	KP	EMAIL CORRESPONDENCE WITH T. NG; PROVIDE INVENTORY OF CLIENT DATA COPIED TO EXTERNAL HARD DRIVE FOR TRANSFER TO CLIENTS NEW COUNSEL.	.5	87.50
11/29/21	ANJ	REVIEW EMAILS AND PULL PRODUCTION PASSWORDS FOR RUIFENG PRODUCTIONS.	2.1	315.00
11/29/21	KP	EMAIL CORRESPONDENCE WITH T. NG; PROVIDE INVENTORY OF CLIENT DATA "CASEFILES" COPIED TO EXTERNAL HARD DRIVE FOR TRANSFER TO CLIENTS NEW COUNSEL.	.7	122.50
11/29/21	TN	HANDLE FILE TRANSFER ISSUES AND NEXT STEPS	.6	231.00
11/30/21	ANJ	COMPILE PRODUCTION PASSWORDS.	1.9	285.00
11/30/21	TN	HANDLE FILE TRANSFER ISSUES; CURSORY REVIEW OF DEFENDANT'S MOTION TO VACATE PROTECTIVE ORDER	.3	115.50

Date	Description of Disbursement	CheckNo	Units	Amount
10/06/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 10/06/21			1.10
10/13/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 10/13/21			6.20
10/14/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 10/14/21			.10
10/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW R7363-2 RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC. 11/30/21 1108351 Page 4

Date	Description of Disbursement	CheckNo	Units	Amount
10/31/21	GOLDSTEIN, DAVID ON 10/18/21	591828		27.62
10/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 10/18/21	591828		14.78
10/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 10/18/21	591828		29.58
10/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 10/19/21	591828		7.39
10/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 10/19/21	591828		27.62
10/31/21	ONLINE RESEARCH LEXIS-NEXIS DOC ACCESS PERFORMED BY GOLDSTEIN, DAVID ON 10/19/21	591828		22.17
10/31/21	ONLINE RESEARCH LEXIS-NEXIS ACCESS CHARGE PERFORMED BY GOLDSTEIN, DAVID ON 10/27/21	591828		248.67
11/01/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 9/15/21			
11/01/21	PARKING FOR DYLAN WISEMAN DURING 9/15/2021 COURT HEARING			20.00
11/01/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 9/15/21			
11/01/21	ROUNDTRIP MILEAGE FROM SACRAMENTO TO SAN FRANCISCO FOR IN PERSON COURT HEARING ON 9/15/2021. (MILES 173.00)			99.48
11/01/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 10/08/21			
11/01/21	PARKING FOR DYLAN WISEMAN DURING MOTION HEARING ON 10/8/2021.			22.00
11/01/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 10/08/21			
11/01/21	ROUNDTRIP MILEAGE FROM SACRAMENTO TO SAN FRANCISCO FOR IN PERSON HEARING ON 10/8/21. (MILES 170.00)			97.75
11/01/21	[REDACTED]			12.41
11/08/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 755787469 DATED: 11/08/21 TRACKING# 775112792026 ON 11/03/21 FROM: AMY SMITH, BUCHALTER, 500 CAPITOL MALL, SUITE 1900, SACRAMENTO, CA 95814 TO: J. JAMES LI/D. PETERSON, 1905 HAMILTON AVENUE, SAN JOSE, CA 95125	591647		13.36
11/15/21	MESSANGER SERVICE FIRST LEGAL NETWORK, LLC FROM BUCHALTER, A PROFESSIONAL CORP., SACRAMENTO TO USDC, SAN FRANCISCO ON 11/05/21 1607598	592381		48.75

Recap of Services	Hours	Effective Rate	Fees
BRANDON M. CARR	.2	540.00	108.00
ANTOINETTE N. JOHNSON	2.2		No Charge
	56.1	150.00	8,415.00
DYLAN WISEMAN	7.5	620.00	4,650.00
KEVIN PARKER	44.0	175.00	7,700.00
TIFFANY NG	30.0	385.00	11,550.00
DAVID GOLDSTEIN	16.3	345.00	5,623.50
Total	156.3		38,046.50

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

Buchalter

1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	11/30/21 1108351 Page 5
-----------------------	---------	--	-------------------------------

Date	Description of Disbursement	CheckNo	Units	Amount
Total Fees				38,046.50
Total Disbursements				698.98
Matter Total				\$ 38,745.48

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

Buchalter

1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

**GANGYOU WANG
RUIFENG BIZTECH INC.
3563 INVESTMENT BLVD STE 2
HAYWARD CA 94545**

Attn: MATTHEW ZHANG

December 31, 2021
Invoice No. 1115149

Re: QUINTARA BIOSCIENCES, INC.
Our File No: R7363-2

Case Number: 5:20-CV-04808

Previous Balance	978,512.26
Payments received through 01/11/22	.00
Adjustments through 12/31/21	978,502.27-
Previous Balance Remaining	9.99
Current Fees Through 12/31/21	16,229.50
Current Disbursements Through 12/31/21	261.67
Invoice Total	\$ 16,491.17
Balance Due	\$ 16,501.16

Wire Instructions

ZB, N.A, dba California Bank & Trust - 550 South Hope Street - Suite 300 - Los Angeles, CA 90071

ABA#: 121002042 - Swift Code: ZFNBUS55
Account Name: Buchalter - Account No: 3240017271
Reference: Invoice number(s)

To pay by Visa or MasterCard
go to the payment portal on www.Buchalter.com

Past Due Balances:			Total Due including this invoice
30 days	60 days	90 days	
9.99	.00	.00	16,501.16

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/21 1115149 Page 1	
Date	Tkpr	Description of Services Rendered	Hours	Amount
10/28/21	NY	CONFER WITH CASE TEAM RE DATA TRANSFER TO NEW COUNSEL.	.5	92.50
10/29/21	NY	CONFER WITH CASE TEAM RE THE CASE TRANSFER TO NEW COUNSEL.	.4	74.00
12/01/21	ANJ	FINALIZE LIST OF FILE NAMES AND PASSWORDS FOR RUIFENG PRODUCTIONS	.6	90.00
12/01/21	KP	COMPRESS AND UPLOAD CLIENT PRODUCTIONS TO SHAREFILE FOR TRANSFER TO CLIENT.	2.3	402.50
12/01/21	TN	HANDLE FILE TRANSFER ISSUES; CORRESPOND WITH NEW COUNSEL RE THE SAME; REVIEW COURT ORDER RE MOTION TO VACATE PROTECTIVE ORDER; DISCUSS MOTION FOR GOOD FAITH SETTLEMENT HEARING STRATEGY WITH DAVID G.	1.0	390.00
12/02/21	TN	MONITOR NEW COUNSEL FILINGS; FURTHER HANDLE FILE TRANSFER ISSUES	.9	351.00
12/03/21	KP	EMAIL CORRESPONDENCE WITH T. NG; COMPRESS AND UPLOAD 06_DISCOVERY (NOT CONFIDENTIAL-AEO) AND THIRD PARTY PRODUCTIONS TO SHAREFILE FOR TRANSFER TO CLIENT	1.7	297.50
12/03/21	TN	FURTHER HANDLE FILE TRANSFER ISSUES	.3	117.00
12/06/21	ANJ	REVIEW EMAIL AND ATTACHMENTS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	2.1	315.00
12/07/21	ANJ	REVIEW EMAIL AND ATTACHMENTS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	2.6	390.00
12/07/21	KP	EMAIL CORRESPONDENCE WITH T. NG; REVIEW QUINTARA NON-CONFIDENTIAL DOCUMENTS FOR TRANSFER TO NEW COUNSEL; QUERY, EXPORT, COMPRESS AND UPLOAD QUINTARA NON-CONFIDENTIAL DOCUMENTS TO SHAREFILE FOR TRANSFER TO NEW COUNSEL.	4.3	752.50
12/08/21	ANJ	REVIEW EMAIL AND ATTACHMENTS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	6.1	915.00
12/08/21	DWW	REVIEW/ANALYSIS OF BRIEFING REGARDING MOTION TO "VACATE" PROTECTIVE ORDER; CORRESPONDENCE WITH D. GOLDSTEIN REGARDING DECEMBER 16, 2021 HEARING ON MOTION FOR GOOD FAITH SETTLEMENT.	.9	558.00
12/09/21	ANJ	REVIEW EMAIL AND ATTACHMENTS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	3.6	540.00
12/09/21	KP	CREATE "FURTHER REVIEW BY TONI" RELATIVITY REVIEW SEARCH; EMAIL CORRESPONDENCE WITH T. JOHNSON.	.6	105.00
12/10/21	ANJ	REVIEW EMAIL AND ATTACHMENTS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	9.3	1,395.00
12/10/21	DWW	REVIEW/ANALYSIS OF QUINTARA OPPOSITION TO MOTION TO "VACATE" PROTECTIVE ORDER AND PREPARE UPDATE TO A. WONG AND R. SHAO REGARDING BASELESS STRATEGY OF JUNIOR LAWYER.	.6	372.00
12/12/21	TN	CONTINUE TO HANDLE FILE TRANSFER ISSUES; REVIEW OPPOSITION AND REPLY TO MOTION TO VACATE; PREPARE FOR MOTION FOR GOOD FAITH SETTLEMENT HEARING	1.5	585.00
12/13/21	ANJ	PREFORM ADDITIONAL SEARCHES AND QUALITY CHECKS FOR CONFIDENTIAL OR ATTORNEYS' EYES ONLY INFORMATION SUBJECT TO THE PROTECTIVE ORDER.	3.6	540.00
12/13/21	KP	QUERY IN RELATIVITY NON CONFIDENTIAL EMAIL DOCUMENTS AND PREPARE FOR EXPORT; EXPORT, FINALIZE, COMPRESS AND UPLOAD "20211213 NON-CONFIDENTIAL EMAILS" TO SHAREFILE FOR DELIVERY ; EMAIL CORRESPONDENCE AND TELECONFERENCE WITH T. JOHNSON.	4.8	840.00
12/13/21	TN	CONTINUE TO HANDLE FILE TRANSFER ISSUES; PREPARE FOR MOTION FOR GOOD FAITH SETTLEMENT HEARING; CORRESPOND WITH NEW COUNSEL	1.3	507.00

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/21 1115149 2	
			Page	2
Date	Tkpr	Description of Services Rendered	Hours	Amount
12/13/21	DCS	PREPARE FOR GOOD FAITH SETTLEMENT HEARING.	1.3	585.00
12/13/21	DG	PREPARATION FOR HEARING ON MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION; REVIEW PLEADINGS AND HEARING TRANSCRIPTS; CONFERENCE WITH T. NG.	2.5	875.00
12/15/21	TN	PREPARE FOR GOOD FAITH SETTLEMENT HEARING; REVIEW COURT ORDERS	1.2	468.00
12/16/21	ANJ	BEGIN RE-MARKING EMAILS WITH ATTORNEY EYES ONLY AND CONFIDENTIAL INFORMATION IN PREPARATION FOR JUDGE'S RULING ON PROTECTIVE ORDER DISPUTE.	.9	135.00
12/16/21	DWW	CORRESPONDENCE WITH T. NG REGARDING HEARING UPDATE AND STATUS.	.2	124.00
12/16/21	TN	PREPARE FOR AND ATTEND GOOD FAITH SETTLEMENT MOTION HEARING AND MOTION TO VACATE PROTECTIVE ORDER; CONTINUE TO HANDLE FILE TRANSFER ISSUES	1.5	585.00
12/16/21	DG	APPEAR TELEPHONICALLY FOR HEARING ON MOTION FOR GOOD FAITH SETTLEMENT DETERMINATION.	1.0	350.00
12/17/21	ANJ	FINALIZE RE-MARKING EMAILS WITH ATTORNEY EYES ONLY AND CONFIDENTIAL INFORMATION IN PREPARATION FOR JUDGE'S RULING ON PROTECTIVE ORDER.	2.8	420.00
12/17/21	TN	REVIEW COURT ORDER DENYING MOTION TO VACATE PROTECTIVE ORDER; MANAGE FILE TRANSFER ISSUES	.4	156.00
12/20/21	ANJ	FINALIZE REVIEW OF PLEADINGS WITH ATTORNEYS' EYES ONLY AND CONFIDENTIAL MATERIAL IN PREPARATION FOR JUDGE'S RULING ON PROTECTIVE ORDER.	4.1	615.00
12/20/21	TN	CONTINUE TO MANAGE FILE TRANSFER ISSUES	.4	156.00
12/22/21	KP	COPY ADDITIONAL CLIENT DATA TO HARD DRIVE FOR DELIVERY TO NEW COUNSEL PER T. NG; QUERY AND EXPORT RESPONSIVE EMAIL, POST PROCESS, AND COPY TO HARD DRIVE FOR TRANSFER TO NEW COUNSEL; EMAIL CORRESPONDENCE WITH T. NG.	4.0	700.00
12/22/21	TN	CONTINUE TO MANAGE FILE TRANSFER ISSUES	.9	351.00
12/23/21	KP	FINALIZE CLIENT DATA AND HARD DRIVE FOR TRANSFER TO NEW COUNSEL.	2.0	350.00
12/23/21	TN	CONTINUE TO HANDLE FILE TRANSFER ISSUES; CORRESPOND WITH PLAINTIFF'S COUNSEL RE CONFIDENTIAL/AEO DOCUMENTS	.7	273.00
12/27/21	KP	TROUBLESHOOT HARD DRIVE PASSWORD ISSUES AND RESET PASSWORD; PACKAGE AND SHIP HARD DRIVE TO NEW COUNSEL; EMAIL CORRESPONDENCE WITH T. NG.	1.5	262.50
12/27/21	TN	CONTINUE TO HANDLE FILE DELIVER ISSUES	.3	117.00
12/28/21	TN	CONTINUE TO HANDLE FILE TRANSFER ISSUES	.2	78.00

Date	Description of Disbursement	CheckNo	Units	Amount
11/19/21	PACER SERVICE CENTER - WEB PAGES ONLINE COURT ACCESS FEE (CANDC) ON 11/19/21			.40
12/01/21	TRAVEL EXPENSES TIFFANY NG EXPENSE REPORT - 10/08/21 FEE FOR PARKING RE MOTION HEARING ATTENDANCE.			22.00
12/01/21	ONLINE RESEARCH THOMSON REUTERS - WEST #1000288279 PERFORMED BY WISEMAN,DYLAN ON 11/15/21	592228		11.01
12/15/21	TRAVEL EXPENSES DYLAN W. WISEMAN EXPENSE REPORT - 10/13/21 PARKING FOR DYLAN WISEMAN DURING DEPOSITION OF TOMO			

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement



1000 Wilshire Boulevard
Suite 1500
Los Angeles, CA 90017-1730
(213) 891-0700 Telephone
(213) 896-0400 Facsimile
95-2640846
<http://www.buchalter.com>

File Number DWW	R7363-2	RUIFENG BIZTECH, INC., RF BIOTECH LLC, G. WANG, A. QUINTARA BIOSCIENCES, INC.	12/31/21 1115149 3	
			Page	
Date	Description of Disbursement	CheckNo	Units	Amount
12/15/21	KIMURA. [REDACTED] [REDACTED] [REDACTED]			25.00
12/30/21	OTHER: RELATIVITY ODA LLC MONTHLY GB FEE FOR REVIEW USAGE			64.32
12/30/21	FEDERAL EXPRESS FEDERAL EXPRESS INVOICE# 761525088 DATED: 12/30/21 TRACKING# 775609010664 ON 12/27/21 FROM: NIKKISA DE LUNA, BUCHALTER, 1000 WILSHERE BLVB, LOS ANGELES, CA 90017 TO: RESHMA KAMATH, 1968 S. COAST HWY, LAGUNA BEACH, CA 92651	592748		116.82 22.12
Recap of Services		Hours	Effective Rate	Fees
ANTOINETTE N. JOHNSON		35.7	150.00	5,355.00
DYLAN WISEMAN		1.7	620.00	1,054.00
NILI YAVIN		.9	185.00	166.50
KEVIN PARKER		21.2	175.00	3,710.00
TIFFANY NG		10.6	390.00	4,134.00
DOUGLAS C. STRAUS		1.3	450.00	585.00
DAVID GOLDSTEIN		3.5	350.00	1,225.00
Total		74.9		16,229.50
Total Fees				16,229.50
Total Disbursements				261.67
Matter Total			\$	16,491.17

BALANCES ARE DUE AND PAYABLE UPON PRESENTATION

Payments received prior to the statement processing date are reflected on the statement

FILED UNDER SEAL

EXHIBIT 21

EXHIBIT 22

**HaystackID**accountsreceivable@haystackid.com
www.haystackid.com

INVOICE

BILL TOGangyou Wang
3563 Investment Blvd., Suite 2
Hayward, CA 94545**SHIP TO**Tiffany F. Ng
Buchalter, A Professional
Corporation
55 Second Street, Suite 1700
San Francisco, CA 94105**INVOICE #** 48325**DATE** 02/28/2021**DUE DATE** 03/30/2021**TERMS** Net 30**SHIP DATE**

02/01/2021

SHIP VIA

Gangyou Wang

P.O. NUMBER

Quintara Biosciences Inc

SALES REP

MS

DESCRIPTION**QTY****RATE****AMOUNT**Forensic Collection - Remote, Target,
Network, Cloud/Web

10.30

250.00

2,575.00

Forensic Project Management

1

195.00

195.00

Forensic Media

3

150.00

450.00

Forensic Expense

1

150.94

150.94

FedEx Fees

1

38.73

38.73

772902606662

Quintara Biosciences Inc v Ruifeng Biztech Inc

BALANCE DUE

\$3,409.67

ACH- TCF National Bank

Routing Number: 291 070 001

Account Number: 4444 174337

Currency: \$USD

Checks: Please make checks payable to: HaystackID LLC.

Please remit payment to:

Attn: Lockbox Operations PO Box 6459, Carol Stream, IL 60197-6459

Overnight Address: Attn: Lockbox Oper. (Box #6459) 2012 Corporate Lane, Ste. #108, Naperville, IL 60563

Tax ID: 90-0668512

**HaystackID**

accountsreceivable@haystackid.com
www.haystackid.com

INVOICE

BILL TO

Gangyou Wang
3563 Investment Blvd., Suite 2
Hayward, CA 94545

SHIP TO

Tiffany F. Ng
Buchalter, A Professional
Corporation
55 Second Street, Suite 1700
San Francisco, CA 94105

INVOICE # 49303**DATE** 03/31/2021**DUE DATE** 04/30/2021**TERMS** Net 30**SHIP DATE**

03/01/2021

SHIP VIA

Gangyou Wang

P.O. NUMBER

Quintara Biosciences Inc

SALES REP

MS

DESCRIPTION

QTY

RATE

AMOUNT

Forensic Collection - Remote, Target,
Network, Cloud/Web

8.20

250.00

2,050.00

Forensic Services – Forensic Investigation, Analysis, Report Generation, Web Collections, Targeted
Collections

7.70

300.00

2,310.00

Forensic Project Management

1.20

195.00

234.00

Forensic Media

2

150.00

300.00

Quintara Biosciences Inc v Ruifeng Biztech Inc

BALANCE DUE

\$4,894.00

ACH- TCF National Bank

Routing Number: 291 070 001

Account Number: 4444 174337

Currency: \$USD

Checks: Please make checks payable to: HaystackID LLC.

Please remit payment to:

Attn: Lockbox Operations PO Box 6459, Carol Stream, IL 60197-6459

Overnight Address: Attn: Lockbox Oper. (Box #6459) 2012 Corporate Lane, Ste. #108, Naperville, IL 60563

Tax ID: 90-0668512

**HaystackID**accountsreceivable@haystackid.com
www.haystackid.com

INVOICE

BILL TOGangyou Wang
3563 Investment Blvd., Suite 2
Hayward, CA 94545**SHIP TO**Tiffany F. Ng
Buchalter, A Professional
Corporation
55 Second Street, Suite 1700
San Francisco, CA 94105**INVOICE #** 51149**DATE** 06/30/2021**DUE DATE** 07/30/2021**TERMS** Net 30**SHIP DATE**

06/01/2021

SHIP VIA

Gangyou Wang

P.O. NUMBER

Quintara Biosciences Inc

SALES REP

MS

DESCRIPTION	QTY	RATE	AMOUNT
DataThresher Data Hosting	8,937.31	2.00	17,874.62
Forensic Collection - Remote, Target, Network, Cloud/Web	27	250.00	6,750.00
Forensic Services – Forensic Investigation, Analysis, Report Generation, Web Collections, Targeted Collections	26.30	300.00	7,890.00
Forensic Project Management	12.30	195.00	2,398.50
In Person and Written Testimony	3.70	500.00	1,850.00
Forensic Expenses	1	1,439.16	1,439.16
Forensic Travel Charges	11.70	125.00	1,462.50
Project Manager	21.10	195.00	4,114.50
Forensic Media	5	150.00	750.00
eDiscovery Processing - Native Extraction (IN)	5,284.25	15.00	79,263.75
eDiscovery Processing - TIFF Production (OCR & EBL Included)	0.90	195.00	175.50

Quintara Biosciences Inc v Ruifeng Biztech Inc

BALANCE DUE

\$123,968.53

ACH- TCF National Bank

Routing Number: 291 070 001

Account Number: 4444 174337

Currency: \$USD

Checks: Please make checks payable to: HaystackID LLC.

Please remit payment to:

Attn: Lockbox Operations PO Box 6459, Carol Stream, IL 60197-6459

Overnight Address: Attn: Lockbox Oper. (Box #6459) 2012 Corporate Lane, Ste. #108, Naperville, IL 60563

Tax ID: 90-0668512

**HaystackID**

accountsreceivable@haystackid.com
www.haystackid.com

INVOICE

BILL TO

Gangyou Wang
3563 Investment Blvd., Suite 2
Hayward, CA 94545

SHIP TO

Tiffany F. Ng
Buchalter, A Professional
Corporation
55 Second Street, Suite 1700
San Francisco, CA 94105

INVOICE # 52050**DATE** 07/31/2021**DUE DATE** 08/30/2021**TERMS** Net 30**SHIP DATE**

07/01/2021

SHIP VIA

Gangyou Wang

P.O. NUMBER

Quintara Biosciences Inc

SALES REP

MS

CASE ID

BUCH_0005267

DESCRIPTION

QTY

RATE

AMOUNT

DataThresher Data Hosting	8,937.31	2.00	17,874.62
Forensic Collection - Remote, Target, Network, Cloud/Web	24.70	250.00	6,175.00
Forensic Consulting	24	300.00	7,200.00
Forensic Project Management	4.70	195.00	916.50
Live & Written Testimony	14.30	500.00	7,150.00
Forensic Expenses	1	977.83	977.83
Project Management	3.50	195.00	682.50
Native Promotion	0.10	75.00	7.50
Forensic Media	4	150.00	600.00
FedEx Fees	1	598.20	598.20
774305007944			
281512871181			
774347592024			
774169551262			
774169572320			
774168965090			
774174669163			

Quintara Biosciences Inc v Ruifeng Biztech Inc

BALANCE DUE

\$42,182.15

ACH- TCF National Bank

Routing Number: 291 070 001

Account Number: 4444 174337

Currency: \$USD

Checks: Please make checks payable to: HaystackID LLC.

Please remit payment to:

Attn: Lockbox Operations PO Box 6459, Carol Stream, IL 60197-6459

Overnight Address: Attn: Lockbox Oper. (Box #6459) 2012 Corporate Lane, Ste. #108, Naperville, IL 60563

Tax ID: 90-0668512

EXHIBIT 23

Ruifeng Biztech
Statement of Account as of December 7, 2021

<u>Date</u>	<u>Description</u>	<u>Debits</u>	<u>Credits</u>	<u>Balance</u>
10/7/2021	Inv # 6457675 - Buchalter - Ruifeng Biztech Inc Se	\$ 128.10	\$ -	\$ 5,973.10
9/13/2021	Inv # 6434963 - FAS CS 2021 Buchalter - Ruifeng Bi	\$ 320.25	\$ -	\$ 5,845.00
7/12/2021	Inv # 6391874 - June 2021 Deposition (MKS)	\$ 305.00	\$ -	\$ 5,524.75
7/11/2021	Inv # 6391277 - FAS CS 2021 Buchalter - Ruifeng Bi	\$ 15,219.75	\$ -	\$ 5,219.75
6/18/2021	Payment - Check #0687	\$ -	\$ 10,000.00	\$ (10,000.00)
6/14/2021	Payment - Check #0681	\$ -	\$ 256.20	\$ 0.00
6/9/2021	Payment - Check #0686	\$ -	\$ 31,973.03	\$ 256.20
6/3/2021	Inv # 6364663 - FAS CS 2021 Buchalter - Ruifeng Bi	\$ 31,973.03	\$ -	\$ 32,229.23
5/7/2021	Inv # 6340030 - FAS CS 2021 Buchalter - Ruifeng Bi	\$ 256.20	\$ -	\$ 256.20

RSM

FEIN # 42-0714325

RSM US LLP
 515 South Flower St. 17th Floor
 Los Angeles, CA 90071
 United States
 Phone: (213) 330-4600

REMIT TO:
 RSM US LLP
 5155 Paysphere Circle
 Chicago, IL 60674
 United States

5155 0007832026 0006391277 07122021 0001521975 9

DYLAN W. WISEMAN, ESQ.
 BUCHALTER, A PROFESSIONAL CORPORATION
 55 SECOND ST STE 1700
 SAN FRANCISCO, CA 94105
 UNITED STATES

July 11, 2021

Account No. 783-202-6 MS

Invoice No. 6391277

Amount Paid \$ _____

Amount Due \$15,219.75 USD**INVOICE****Please return top portion with payment**

783-202-6 Buchalter, A Professional Corporation

07/11/2021

Invoice # 6391277

Office # 159

Professional services rendered in connection with the Quintara Biosciences, Inc.
 vs. Ruifeng Biztech, Inc., Gangyou Wang, Alex Wong, Alan Li, Rui Shao and RF
 Biotech LLC from June 1, 2021 through June 30, 2021.

Professional	Hours	Rate	Fees	
Becky O'Malley	9.6	\$525	\$ 5,040.00	
Maryellen Sebold	15.5	\$610	\$ 9,455.00	\$14,495.00

Administrative Expense 5%

724.75

Invoice Total	\$15,219.75
----------------------	--------------------

Mail-in Checks should be sent to the "Remit To" address above.**ACH/EDI/EFT Instructions**

Bank of America, 1401 Elm Street 2nd Fl., Dallas TX 75202
 Name on Bank Account: RSM US LLP
 ABA#: 071000039 Acct#: 5800965054

Email for payment notification: remittanceadvice@rsmus.com**Wire Instructions**

Bank of America, 100 W 33rd St., New York, NY 10001
 Name on Bank Account: RSM US LLP
 ABA#: 026009593, Acct#: 5800965054, Swift #: BOFAUS3N

Please include your Acct # and Invoice #

Would you like to receive your RSM invoice via email? Send an email to RSMUSBillingTeam@rsmus.com to update your
 invoice delivery preferences.

Buchalter, A Professional Corporation

Buchalter - Ruifeng Biztech Inc

Invoice Detail (Professional Fees)

Professional	Level	Date	Hours	Rate	Fees	Description of Services
O'Malley, Becky	Director	06/03/2021	2.1	525.00	1,102.50	Prepare files in response to Sebold subpoena.
Sebold, Maryellen	Partner	06/07/2021	0.1	610.00	61.00	Call with D. Wiseman and B. O'Malley re: case issues, deposition date.
Sebold, Maryellen	Partner	06/09/2021	0.5	610.00	305.00	Scanned notes for production.
Sebold, Maryellen	Partner	06/11/2021	0.2	610.00	122.00	Call with T. Ng re: notes.
Sebold, Maryellen	Partner	06/17/2021	2.5	610.00	1,525.00	Reviewed deposition of Xueling Zhao, discovery pleadings, other supporting documents in preparation for deposition.
Sebold, Maryellen	Partner	06/18/2021	0.2	610.00	122.00	Discussion with D. Wiseman re: deposition prep and documents produced.
Sebold, Maryellen	Partner	06/18/2021	1.0	610.00	610.00	Reviewed deposition of Qun Shan.
Sebold, Maryellen	Partner	06/18/2021	0.3	610.00	183.00	Discussion with B. O'Malley re: document production by Kimura. Discussed other deposition prep issues.
O'Malley, Becky	Director	06/18/2021	2.0	525.00	1,050.00	Discussion with counsel regarding depositions. Review Kimura document production. Analysis of Ruifeng repayment schedules and ledger reports.
Sebold, Maryellen	Partner	06/21/2021	5.0	610.00	3,050.00	Prepared for deposition. Reviewed report and supporting documents. Discussion with B. O'Malley. Discussion with D. Wiseman. Received Ruifeng financial information.
O'Malley, Becky	Director	06/21/2021	2.5	525.00	1,312.50	Review additional documents received. Depo prep call with M. Sebold.
Sebold, Maryellen	Partner	06/22/2021	4.5	610.00	2,745.00	Attended deposition of T. Kimura.
Sebold, Maryellen	Partner	06/22/2021	0.2	610.00	122.00	Call with D. Wiseman to review deposition of Kimura.
O'Malley, Becky	Director	06/22/2021	3.0	525.00	1,575.00	Prepare document inventory of additional documents received. Analyze Ruifeng QuickBooks file. Discussion with M. Sebold.
Sebold, Maryellen	Partner	06/23/2021	1.0	610.00	610.00	Prepared for deposition.
Total			25.1		14,495.00	
Invoice Total					\$14,495.00	

RSM

FEIN # 42-0714325

RSM US LLP
 515 South Flower St. 17th Floor
 Los Angeles, CA 90071
 United States
 Phone: (213) 330-4600

REMIT TO:
 RSM US LLP
 5155 Paysphere Circle
 Chicago, IL 60674
 United States

5155 0007832026 0006391874 07122021 0000030500 3

DYLAN W. WISEMAN, ESQ.
 BUCHALTER, A PROFESSIONAL CORPORATION
 55 SECOND ST STE 1700
 SAN FRANCISCO, CA 94105
 UNITED STATES

July 12, 2021

Account No. 783-202-6 MS

Invoice No. 6391874

Amount Paid \$ _____

Amount Due \$305.00 USD**INVOICE****Please return top portion with payment**

783-202-6 Buchalter, A Professional Corporation

07/12/2021

Invoice # 6391874

Office # 159

Professional services rendered in connection with the Quintara Biosciences, Inc.
 vs. Ruifeng Biztech, Inc., Gangyou Wang, Alex Wong, Alan Li, Rui Shao and RF
 Biotech LLC on June 23, 2021.

\$305.00

Maryellen Sebold - Deposition 0.5 hour at a rate of \$610 per hour

Invoice Total	\$305.00
----------------------	-----------------

Mail-in Checks should be sent to the "Remit To" address above.**ACH/EDI/EFT Instructions**

Bank of America, 1401 Elm Street 2nd Fl., Dallas TX 75202
 Name on Bank Account: RSM US LLP
 ABA#: 071000039 Acct#: 5800965054

Email for payment notification: remittanceadvice@rsmus.com**Wire Instructions**

Bank of America, 100 W 33rd St., New York, NY 10001
 Name on Bank Account: RSM US LLP
 ABA#: 026009593, Acct#: 5800965054, Swift #: BOFAUS3N

Please include your Acct # and Invoice #

**Would you like to receive your RSM invoice via email? Send an email to RSMUSBillingTeam@rsmus.com to update your
 invoice delivery preferences.**

RSM

FEIN # 42-0714325

RSM US LLP
515 South Flower St. 17th Floor
Los Angeles, CA 90071
United States
Phone: (213) 330-4600

REMIT TO:
RSM US LLP
5155 Paysphere Circle
Chicago, IL 60674
United States

5155 0007832026 0006434963 09132021 0000032025 2

DYLAN W. WISEMAN, ESQ.
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND ST STE 1700
SAN FRANCISCO, CA 94105
UNITED STATES

September 13, 2021

Account No. 783-202-6 MS

Invoice No. 6434963

Amount Paid \$ _____

Amount Due \$320.25 USD**INVOICE****Please return top portion with payment**

783-202-6 Buchalter, A Professional Corporation

09/13/2021

Invoice # 6434963

Office # 159

Professional services rendered in connection with the Quintara Biosciences, Inc.
vs. Ruifeng Biztech, Inc., Gangyou Wang, Alex Wong, Alan Li, Rui Shao and RF
Biotech LLC from August 1, 2021 through August 31, 2021.

Professional	Hours	Rate	Fees	
Maryellen Sebold	0.5	\$610	\$305	\$305.00
Administrative Expense 5%				15.25

Invoice Total	\$320.25
----------------------	-----------------

Mail-in Checks should be sent to the "Remit To" address above.**ACH/EDI/EFT Instructions**

Bank of America, 1401 Elm Street 2nd Fl., Dallas TX 75202
Name on Bank Account: RSM US LLP
ABA#: 071000039 Acct#: 5800965054

Email for payment notification: remittanceadvice@rsmus.com**Wire Instructions**

Bank of America, 100 W 33rd St., New York, NY 10001
Name on Bank Account: RSM US LLP
ABA#: 026009593, Acct#: 5800965054, Swift #: BOFAUS3N

Please include your Acct # and Invoice #

Would you like to receive your RSM invoice via email? Send an email to RSMUSBillingTeam@rsmus.com to update your invoice delivery preferences.

Buchalter, A Professional Corporation
Buchalter - Ruifeng Biztech Inc

Invoice Detail (Professional Fees)

Professional	Level	Date	Hours	Rate	Fees	Description of Services
Sebold, Maryellen	Partner	8/2/2021	0.5	610.00	305.00	Reviewed deposition, signed, returned with errata sheet.
Total Fees			0.5		305.00	
Invoice Total					\$305.00	

RSM

FEIN # 42-0714325

RSM US LLP
515 South Flower St. 17th Floor
Los Angeles, CA 90071
United States
Phone: (213) 330-4600

REMIT TO:
RSM US LLP
5155 Paysphere Circle
Chicago, IL 60674
United States

5155 0007832026 0006457675 10072021 0000012810 8

DYLAN W. WISEMAN, ESQ.
BUCHALTER, A PROFESSIONAL CORPORATION
55 SECOND ST STE 1700
SAN FRANCISCO, CA 94105
UNITED STATES

October 07, 2021

Account No. 783-202-6 MS

Invoice No. 6457675

Amount Paid \$ _____

Amount Due \$128.10 USD**INVOICE****Please return top portion with payment**

783-202-6 Buchalter, A Professional Corporation

10/07/2021

Invoice # 6457675

Office # 159

Professional services rendered in connection with the Quintara Biosciences, Inc.
vs. Ruifeng Biztech, Inc., Gangyou Wang, Alex Wong, Alan Li, Rui Shao and RF
Biotech LLC from September 1, 2021 through September 30, 2021.

Professional	Hours	Rate	Fees	
Maryellen Sebold	0.2	\$610	\$122.00	\$122.00
Administrative Expense 5%				6.10

Invoice Total	\$128.10
----------------------	-----------------

Mail-in Checks should be sent to the "Remit To" address above.**ACH/EDI/EFT Instructions**

Bank of America, 1401 Elm Street 2nd Fl., Dallas TX 75202
Name on Bank Account: RSM US LLP
ABA#: 071000039 Acct#: 5800965054

Email for payment notification: remittanceadvice@rsmus.com**Wire Instructions**

Bank of America, 100 W 33rd St., New York, NY 10001
Name on Bank Account: RSM US LLP
ABA#: 026009593, Acct#: 5800965054, Swift #: BOFAUS3N

Please include your Acct # and Invoice #

Would you like to receive your RSM invoice via email? Send an email to RSMUSBillingTeam@rsmus.com to update your invoice delivery preferences.

Buchalter, A Professional Corporation

Invoice Detail (Professional Fees)

Professional	Level	Date	Hours	Rate	Fees	Description of Services
Maryellen Sebold	Partner	9/2/2021	0.2	610.00	122.00	Call with D. Wiseman re: case update, new calendar, deposition and trial dates.
Total			0.2		122.00	
Administrative Fee (5%)					6.10	
Invoice Total					\$128.10	

EXHIBIT 24

Awesome Linguistic Solution

Customer Balance Detail

All Dates

DATE	TRANSACTION TYPE	NUM	DUE DATE	AMOUNT	OPEN BALANCE	BALANCE
Buchalter						
06/24/2021	Invoice	1789	07/24/2021	2,800.00	2,486.65	2,486.65
07/20/2021	Invoice	1802	08/19/2021	1,072.00	1,072.00	3,558.65
08/05/2021	Invoice	1813	09/04/2021	1,422.00	1,422.00	4,980.65
08/23/2021	Invoice	1832	09/22/2021	350.00	350.00	5,330.65
08/27/2021	Invoice	1836	09/26/2021	2,830.94	2,830.94	8,161.59
09/10/2021	Invoice	1852	10/10/2021	350.00	350.00	8,511.59
Total for Buchalter				\$8,824.94	\$8,511.59	
TOTAL				\$8,824.94	\$8,511.59	

Awesome Linguistic Solutions
 2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 % Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1762**DATE** 04/09/2021 **TERMS** Net 30**DUE DATE** 05/09/2021**P.O. NUMBER**

Quintara v. Ruifeng Biztech

DATE	ACTIVITY	QTY	RATE	AMOUNT
04/09/2021	100 Interpretation Service - via Zoom, preparation with Mr. Dylan Wiseman for Mr. Gangyou Wang from 9 am to 2:20 pm. 8 hours full day minimum.	8	350.00	2,800.00
04/09/2023	Fin Chg Finance Charges on Overdue Balance 2 years	2,800	0.20	560.00
07/31/2023	Fin Chg Finance Charges on Overdue Balance for 5 months until 8/9/23	3,360	0.033	110.88

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE**\$3,470.88**

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions

2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 %Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1789

DATE 06/24/2021 **TERMS** Net 30

DUE DATE 07/24/2021

P.O. NUMBER

Ruifeng v. Quintara

DATE	ACTIVITY	QTY	RATE	AMOUNT
06/24/2021	100 Interpretation Service - Depositions: 9 am to 10:35 am, Rui Shao; 11 am to 1:30 pm (including client conference) Gangyou Wang; and 2 pm to 2:50pm Christine Chen. Client conference on Zoom from 3:15 PM TO 4:25PM with Mr. Wang, Alan Li , Alex Wong and counsels of Buchalter.	8	350.00	2,800.00
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 7/24/21 to 3/31/22 for 8 months.	2,486.55	0.067	166.60
03/31/2023	Fin Chg Finance Charges on Overdue Balance one year	2,653.25	0.10	265.33
07/31/2023	Fin Chg Finance Charges on Overdue Balance 4 months	2,918.58	0.033	96.31

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

PAYMENT

313.35

TOTAL DUE

\$3,014.89

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions

2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

RUIFENG

% Buchalter

55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1802

DATE 07/20/2021 TERMS Net 30

DUE DATE 08/19/2021

P.O. NUMBER

Quintara v. Ruifeng

DATE	ACTIVITY	QTY	RATE	AMOUNT
07/20/2021	100 Interpretation Service - In Court Hearing at SF Federal Court Judge Alsup Dept 12 19th floor for Mr. Gangyue Wang from 11 am to 11:54am. 3 hours minimum including travel.	3	350.00	1,050.00
07/20/2021	320 Parking	1	22.00	22.00
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 8/19/21 to 3/31/22 for 8 months.	1,072	0.067	71.82
03/31/2023	Fin Chg Finance Charges on Overdue Balance for one year	1,143.82	0.10	114.38
07/31/2023	Fin Chg Finance Charges on Overdue Balance for 4 months	1,258.20	0.033	41.52

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE

\$1,299.72

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions
 2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 %Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1813

DATE 08/05/2021 **TERMS** Net 30

DUE DATE 09/04/2021

P.O. NUMBER

Ruifeng

DATE	ACTIVITY	QTY	RATE	AMOUNT
08/05/2021	100 Interpretation Service - for Mr. Gangyue Wang of Ruifeng at Judge Alsup's hearing from 7:30 am to 11 am. 4 hours.	4	350.00	1,400.00
08/05/2021	320 Parking fees receipt attached	1	22.00	22.00
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 9/4/21 to 3/31/22 for 7 months.	1,422	0.067	95.27
03/31/2023	Fin Chg Finance Charges on Overdue Balance for one year	1,517.27	0.10	151.73
07/31/2023	Fin Chg Finance Charges on Overdue Balance for 4 months	1,699	0.33	560.67

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE

\$2,229.67

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions
 2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 c/o Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1832**DATE** 08/23/2021 **TERMS** Net 30**DUE DATE** 09/22/2021**P.O. NUMBER**

Ruifeng

DATE	ACTIVITY	QTY	RATE	AMOUNT
08/23/2021	100 Interpretation Service - Teleconference with Dylan Wisemen, Tiffany Ng & Mr. Gangyue Wang from 10 am to 10:40 am.	1	350.00	350.00
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 9/22/2021 to 3/31/22 for 6 months.	350	0.05	17.50
03/31/2023	Fin Chg Finance Charges on Overdue Balance one year	367.50	0.10	36.75
07/31/2023	Fin Chg Finance Charges on Overdue Balance for 4 months	404.25	0.033	13.34

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE**\$417.59**

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions
 2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 %Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1836

DATE 08/27/2021 **TERMS** Net 30

DUE DATE 09/26/2021

P.O. NUMBER

Ruifeng Mediation

DATE	ACTIVITY	QTY	RATE	AMOUNT
08/26/2021	100 Interpretation Service - for mediation and pre-conference with Mr. Wang by Dylan Wiseman via telephone from 9 am, mediation end time 12:55 pm and conference with Mr. Wang by Dylan until 1:10 pm. 8 hour minimum reserved.	8	350.00	2,800.00
08/26/2021	320 Transportation from Buchalter office (Receipt attached)	1	30.94	30.94
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 9/26/21 to 3/31/22 for 6 months.	2,830.94	0.05	141.55
03/31/2023	Fin Chg Finance Charges on Overdue Balance one year	2,972.59	0.10	297.26
07/31/2023	Fin Chg Finance Charges on Overdue Balance for 4 months	3,269.85	0.033	107.91

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE

\$3,377.66

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

Awesome Linguistic Solutions
 2092 14th Ave
 San Francisco, CA 94116-1310
 415-378-9217
 mimi.lain@gmail.com

BILL TO

Ruifeng
 %Buchalter
 55 Second Street, Suite 1700
 San Francisco, CA 94105-3493

INVOICE 1852**DATE** 09/10/2021 **TERMS** Net 30**DUE DATE** 10/10/2021**P.O. NUMBER**

Ruifeng v. Quintara

DATE	ACTIVITY	QTY	RATE	AMOUNT
09/09/2021	100 Interpretation Service - Telephone conference scheduled with Mr. Wang, Dylan Wiseman, Tiffany Ng, and Ruifeng Staff at 6:30 pm but canceled due to no show. Minimum 1 hour billing.	1	350.00	350.00
03/31/2022	Fin Chg Finance Charges on Overdue Balance at 10% per annum from 10/10/21 to 3/31/22 for 5 months.	350	0.042	14.70
03/31/2023	Fin Chg Finance Charges on Overdue Balance 3/31/22-3/31/2023	364.78	0.10	36.48
07/31/2023	Fin Chg Finance Charges on Overdue Balance 3/31/2023-7/31/2023	401.28	0.033	13.24

Awesome Linguistic Solution
 Mimi Lain mimi.lain@gmail.com
 SWIFT:CHASUS33, Routing # 322271627
 Account No. 996158143
 FED TAX ID # 45-3366735
 Payment can be made by check or ACH transfers.

TOTAL DUE**\$414.42**

Past due payment is subject to late charge of \$100/invoice period and maximum finance charge allowed by law currently at 10%.

EXHIBIT 25

Date Entry	Amount	Discount	Charge	Reduction
8/11/2020	0.3	100%	\$ 106.50	\$ 106.50
9/11/2020	2.4	20%	\$ 1,488.00	\$ 297.60
10/15/2020	2.9	30%	\$ 1,566.00	\$ 469.80
10/19/2020	4.5	50%	\$ 2,430.00	\$ 1,215.00
10/19/2020	4.7	40%	\$ 2,914.00	\$ 1,165.60
10/22/2020	4.7	40%	\$ 2,538.00	\$ 1,015.20
10/23/2020	4.6	25%	\$ 2,582.00	\$ 645.50
10/23/2020	0.8	80%	\$ 284.00	\$ 227.20
10/26/2020	1.1	30%	\$ 390.00	\$ 117.00
11/5/2020	2.4	80%	\$ 1,296.00	\$ 1,036.80
11/10/2020	2.3	100%	\$ 1,426.00	\$ 1,426.00
11/11/2020	4.8	20%	\$ 1,512.00	\$ 302.40
11/27/2020	0.8	100%	\$ 423.00	\$ 423.00
12/3/2020	1.9	10%	\$ 1,026.00	\$ 102.60
12/4/2020	0.7	100%	\$ 1,026.00	\$ 1,026.00
12/4/2020	0.7	100%	\$ 378.00	\$ 378.00
12/7/2020	2.5	20%	\$ 1,550.00	\$ 310.00
12/8/2020	0.5	30%	\$ 270.00	\$ 81.00
12/8/2020	3.8	20%	\$ 2,356.00	\$ 471.20
12/9/2020	2.6	50%	\$ 1,612.00	\$ 806.00
12/10/2020	1.7	30%	\$ 918.00	\$ 275.40
12/10/2020	0.3	50%	\$ 106.50	\$ 53.25
12/11/2020	2.2	80%	\$ 781.00	\$ 624.80
12/14/2020	0.4	50%	\$ 216.00	\$ 108.00
12/14/2020	1.4	30%	\$ 497.00	\$ 149.10
12/23/2020	6.5	20%	\$ 3,510.00	\$ 702.00
12/30/2020	6.9	30%	\$ 4,278.00	\$ 1,283.40
12/30/2020	0.4	100%	\$ 142.00	\$ 142.00
1/4/2021	2.9	50%	\$ 1,566.00	\$ 783.00
1/4/2021	2.4	30%	\$ 876.00	\$ 262.80
1/5/2021	2.1	100%	\$ 136.50	\$ 136.50
1/15/2021	1.1	30%	\$ 682.00	\$ 204.60
1/19/2021	2.6	40%	\$ 1,621.00	\$ 648.40
1/29/2021	0.3	100%	\$ 186.00	\$ 186.00
2/16/2021	5.6	10%	\$ 3,024.00	\$ 302.40
2/18/2021	4.5	30%	\$ 2,430.00	\$ 729.00
2/19/2021	2.0	20%	\$ 1,566.00	\$ 313.20
3/1/2021	4.6	10%	\$ 2,484.00	\$ 248.40
3/2/2021	0.6	100%	\$ 372.00	\$ 372.00
3/12/2021	0.9	100%	\$ 486.00	\$ 486.00
3/12/2021	3.1	80%	\$ 1,922.00	\$ 1,537.60
4/19/2021	4.9	20%	\$ 2,646.00	\$ 529.20
8/11/2021	4.2	100%	\$ 1,449.00	\$ 1,449.00
8/11/2021	3.5	30%	\$ 1,207.50	\$ 362.25
8/24/2021	5.6	10%	\$ 3,024.00	\$ 302.40

8/26/2021	6.2	10%	\$	2,325.00	\$	232.50
-----------	-----	-----	----	----------	----	--------

Total: **\$ 24,045.60**